

# Public Directory of Procedures of Thieme Compliance GmbH

## Statement on privacy policy

For us, it is natural to protect your personal data and comply with the provisions of the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG). The purpose of this law is to protect the personal rights of individuals against infringement by use of their personal information. You have a right to information; therefore, we are informing you about our general procedures following the articles 4d and 4e BDSG.

For readability's sake, we refrain from using female and male forms of address; of course, we are referring to both our female and male users.

### 1. Responsible organisation

Thieme Compliance GmbH (hereinafter referred to as "Thieme Compliance")

### 2. Represented by

Reinhold Tokar, managing director  
Dr. Udo Schiller, managing director  
Hubert Köferl, authorised officer

Person responsible for data processing:  
Rainer Friedensohn

The data protection officer:  
Kerstin Blossey  
Phone: +49 9131/93406-19  
E-Mail: [datenschutz@thieme-compliance.de](mailto:datenschutz@thieme-compliance.de)

The competent supervisory data protection authority:  
Bayerisches Landesamt für Datenschutzaufsicht [Bavarian State Office for Data Protection Supervision]  
Promenade 27 (Schloss), 91522 Ansbach  
Phone: +49 981/53-1300  
E-Mail: [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

### 3. Address of the responsible organisation

Thieme Compliance GmbH  
Am Weichselgarten 30  
91058 Erlangen

## 4. Purpose

With more than 30 years of experience in the market, **Thieme Compliance** is a leading system provider for medically and legally well-founded patient information. The specialist for process-oriented solutions offers a comprehensive range of patient information products in all common media: Printed and digital products, films and carbonless forms. Thus, a wide selection is available to clinics and practices and can be adjusted individually to different patient information situations. A team of experts, consisting of more than 400 medical writers, publishers, editors and lawyers, ensures that the products are of the highest quality and are always up to date. The Erlangen company also documents highest quality standards by being certified pursuant to DIN EN ISO 13485 and DIN EN ISO 9001.

To fulfil these tasks, it is necessary to collect, process and use personal and factual information for the following purposes:

- Product information in print and online, consultation on selecting the right product
- Sale of our products, also online
- Executing possible contractual matters
- Technical review and provision of products and services
- Entering and fulfilling support and service agreements
- Invoicing rendered services
- Executing collection procedures
- Reimbursing costs and issuing credit notes
- Answering technical inquiries and inquiries with regard to content, product support
- Participation in and handling of services of third-party providers and external service providers
- Invoicing to third-party providers
- Issuing employee identification media (IDs, certificates, etc.) for access to the company and its systems
- Quality assurance measures
- Preparing, performing and quality assurance of pilot projects and integrated product forms
- Preparing and performing new target- and customer-oriented offers
- Training customers, employees and interested parties
- Maintaining inventory and usage data
- Other services for customers
- Acquisition of new customers
- Recruiting and supporting employees
- Co-ordinating the various departments
- Statistic purposes
- Public engagement to secure innovation
- Research and development
- Marketing of innovative solutions

## 5. Affected groups of persons

- People interested in our range of products on offer
- Our customers
- Our employees
- Third-party employees
- Suppliers, merchants and service providers
- Cooperation and sales partners
- Contacts with the above groups
- Other business partners (with transfer of functions such as e.g. company medical officers)

## 6. Data or data categories

Pursuant to the principle of data economy provided for in the BDSG, we only collect such personal information we require to perform the respective task. Data can be collected in the following categories:

- First and last name, possibly also maiden name (staff)
- Staff number, date of birth (staff)
- Résumés, references and CVs (staff)
- Health data of our employees (staff)
- Information on working hours and holidays (staff)
- Other staff data for human resource development and management (staff)
- Image or audio data (e.g. video, photos, voice mail)
- First and last name of the customer, project number (customers)
- Company affiliation (customers)
- Company or also private address if required (customers)
- Telephone and fax number(s)
- E-mail address(es)
- Data on legal competence and handling of payments (e.g. bank data, credit card data, information on solvency)
- Attributes for identification of a user (e.g. IP addresses, login data)
- Technical data for fulfilment of an agreement (e.g. contact, individual customer requirements)
- Information on start, term and end of a contractual relationship
- Type, scope and period of utilised services
- Identifying features for agreements and licences (e.g. licence number)
- Information on customer satisfaction (customer service)
- Data provided voluntarily by customers, e.g. recommendation of our range of products
- Patient data (in isolated cases if transmitted to us without being requested)
- Data of third parties submitted in a web form, e.g. recommendation of professional articles

If you have given your consent to it in writing:

- Advertising campaigns and promotions
- Market research
- Customer satisfaction surveys for optimisation of our products
- Services for our customers

## 7. Recipients of the data or categories of recipients

- Our internal departments and their employees (depending on their competence and requirements)
- Managing director/management
- Cooperation and sales partners and possibly their subsidiaries
- Technical services insofar as required for the contractual relationship
- Public authorities within the scope of superior legal obligations
- Other positions in the corporate network within the scope of order processing, contract management and customer service

If you have granted us your written consent, we will also use your data for optimising our services and products for our employees and/or customers for

- Advertising campaigns and promotions
- Market research

## 8. Time limits for the deletion of personal information

Currently, the periods for the obligation to preserve and delete data are not always provided for unambiguously since legislation requires adjustment of the periods in many areas. In the areas where provisions are available, we comply with the obligation to delete your data as a matter of routine. This includes but is not limited to the following types of data and time limits:

- **Connection data** are deleted after expiration of the legal periods of preservation of data pursuant to the provisions of the BDSG if they are collected at all.
- **Applicant and staff data** are deleted after six months the latest (data of applicants) or after expiration of the legal periods of preservation of data (after ten years as a rule, staff data) pursuant to the provisions of the BDSG and accompanying further provisions, e.g. the German Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz, AGG).
- **Data of interested parties, customers and business partners** are deleted after expiration of the legal periods of preservation of data pursuant to the provisions of the BDSG (the latest after six or ten years, as a rule). If no period for preservation of data is provided for, the corresponding data will be deleted immediately.
- **If you object to use of your data**, this personal information will be deleted immediately pursuant to the provisions of the BDSG unless required for handling a contractual relationship with you and unless there are other conflicting legal terms. After expiration of such terms the latest, the data will be deleted. The persons concerned are recorded in an internal blocking list pursuant to art. 28 BDSG to ensure that the objection also is effective in the future.

If deletion is not possible for technical or organisational reasons in an isolated case, your data will be blocked from further processing or use in compliance with applicable data protection provisions.

## 9. Data transmission to foreign countries

Transmission of your personal information to the EU (European Union), the EEA (European Economic Area) or third countries will only be made to fulfil the business objectives you have commissioned us with or which we are possibly obliged to comply with under applicable law.

It will be transmitted according to the European Data Protection Regulation (Regulation 95/46/EC, in the future the Basic EU Data Protection Regulation) and in compliance with applicable law, including but not limited to art. 4b and 4d BDSG. We will account for the special protection requirements by taking appropriate steps. This includes but is not limited to transferring only such personal information which is absolutely necessary.

## 10. Safety measures pursuant art. 9 BDSG + Annex

We have taken a variety of provisions to protect your data. Explaining them in detail would therefore be counter-productive because this would make the structure itself vulnerable. Therefore, the legislation provides in your interest that information on the individual technical and organisational measures may not be made publicly accessible.

We assure you that we have taken a variety a measures appropriate for a company of our size in compliance with the requirements of art. 9 BDSG listed below and are constantly adjusting them to the current security situation. These measures include all legally required areas of responsibility:

- Entry control
- Admission control
- Access control
- Transfer control
- Input control

- Order control
- Availability control
- Separation rule
- Use of state-of-the-art encryption procedures

## 11. Contact for further questions or suggestions on the topic of data privacy

Our data privacy officer would be happy to provide you with information on your data stored by us and to correct or delete your data and answer all further questions or suggestions on data privacy:

Ms Blossy ([datenschutz@thieme-compliance.de](mailto:datenschutz@thieme-compliance.de))

Our information on protection of your personal information is updated regularly if necessary. Therefore, please feel free to visit this page again when you come back to this site!

\*\*\*

This information was last updated on: 22 May 2017