

## **Privacy Notice for the Patient Experience Feedback (NPS)**

We have been helping people maintain or regain their freedom of movement since 1919. For us, digitalizing the treatment process means protecting your freedom of movement in the digital world as well. It is therefore important for us to tell you what personal data we collect, how these data are used and what design options you have.

The success of Ottobock depends not only on the global networking of information flows between the Ottobock companies, employees, customers and patients, but above all on the trustful, secure handling of personal data.

The Ottobock SE & Co. KGaA, Max-Näder-Straße 15, 37115 Duderstadt, (hereinafter referred to as „Ottobock“ or „we“) operates the website and survey platform “Patient Experience Feedback” available on the Internet at <https://ottobock.fra1.qualtrics.com/>, including the respective sub-directories (hereinafter referred to as the "website") and processes together with the respective participating Ottobock SE & Co. KGaA’s affiliate company the data collected during the survey as joint controller.

With this Privacy Policy, we inform you about which data we process when you visit our website and take part in the survey. Therewith we also fulfil our obligations from the Art. 13 and Art. 14 of the General Data Protection Regulation (GDPR).

### **I. Definitions**

Our privacy policy is intended to be simple and understandable for everyone. In this privacy policy, the official terms of the General Data Protection Regulation (GDPR) are generally used. The official definitions are explained in Article 4 of the GDPR.

### **II. Controller**

The controller for the data processing on the website is the:

Ottobock SE & Co KGaA, Max-Näder-Strasse 15, 37115 Duderstadt, Germany

If you take part in a survey, the data collected will be processed in joint controllership with the competent regional Ottobock SE & Co. KGaA’s affiliate company. The Ottobock SE & Co. KGaA’s regional affiliates are listed at the end of this notice.

### **III. Data Protection Officer**

You may reach the Data Privacy Team of the Ottobock Group confidentially via <https://www.ottobock.com/en/forms/gdpo-contact-form>.

### **IV. Use of the website**

#### **1. Secure provision of the website**

In case you visit our website, the web server temporarily collects the following information to display the website.

## **2. Processed categories of data:**

- Browser
- Version
- Operating System
- Screen Resolution
- Flash Version
- Java Support
- User Agent
- IP Address
- Date
- Time

## **3. Purposes:**

The interest of Ottobock and its participating affiliate companies is the secure and functional operation of the website and the survey platform. The logged data is used in particular for the purposes of data security, to defend against attempts of attack on our web servers. We reserve the right to carry out statistical evaluation of anonymous data records.

## **4. Legal basis:**

The processing of this data is based on Art. 6 para. 1 f GDPR: We have a legitimate interest in ensuring data security and trouble-free operation

## **5. The processing of this data is based on Art. 6 para. 1 f GDPR: We have a legitimate interest in ensuring data security and trouble-free operation.Storage periods or criteria for determination:**

The aforementioned categories of data are stored for 6 months. This data is never stored together with other personal data of the user, compared with other data or passed on to third parties.

## **6. Information on the use of cookies and other technologies**

Our website uses so-called "cookies". Cookies are small text files that are stored either temporarily for the duration of a session (session cookies) or permanently (permanent cookies) on your terminal device. Session cookies are automatically deleted at the end of your visit. Permanent cookies remain stored on your end device until you delete them yourself or until they are automatically deleted by your web browser.

Cookies have various functions. Many cookies are technically necessary, as certain website functions would not work without them (e.g. the shopping cart function or language settings). Other cookies are used to evaluate user behavior or to display advertising.

The processing of data through the use of absolutely necessary cookies is based on a legitimate interest in accordance with Art. 6 (1) (f) GDPR in the technically error-free provision of our services. For details on the processing purposes and legitimate interests, please refer to the explanations on the specific data processing.

You can set your browser so that you are informed about the setting of cookies, allow cookies only in individual cases, exclude the acceptance of cookies for certain cases or in general, activate the automatic deletion of cookies when closing the browser.

Most browsers also offer a so-called “do-not-track” function. When this function is activated, the respective browser tells advertising networks, websites and applications that you do not want to be “tracked” for the purpose of behavioral advertising and the like.

Please note that if you deactivate cookies, the functionality of our website may be limited. The following cookies are used in our website:

Cookie name: previewDC

- Domain: qualtrics.com
- Validity: 1 Month
- Cookie name: QSI\_HistorySession
- Domain: ottobock.fra1.qualtrics.com

Validity: Session

## **V. Taking part in the survey**

### **1. Improving patient experience**

During the survey, data will be collected for the purposes of evaluating and improving patient experience throughout Ottobock Care.

On our website you can take part in the Patient Experience Feedback survey. You may complete the survey directly on site in the clinic on a tablet provided to you or later by using your own device. For taking the survey at a later time, you will have the option to receive an email or text including a link to the website.

The survey consists of several questions regarding your patient experience. We will calculate a so called net promoter score from the collected information and analyze the score and the information for gaining insights in patient satisfaction and enables us to improve patient experience throughout Ottobock Care.

After the survey is completed, you are asked, if a member of the Ottobock Care team may contact you to discuss your feedback. If you choose yes, we will ask for your name, surname and telephone number and call you afterwards. Your answers during the phone call will also be processed for the purposes of evaluating and improving patient experience.

If you choose not to be contacted, your answers will be processed anonymously. We will not be able to identify you or link the answers to you in any way. If you choose to give your name and surname, however, your answers will be linked and processed in connection with your name, surname and phone number.

For conducting the survey, we use the services of Qualtrics Ireland Ltd., Costello House, 1 Clarendon Row, Dublin 2 D02 TA43, Ireland. Qualtrics Ireland Ltd and its sub processors. These sub processors are also located in third countries outside the EU. Insofar as a third country transfer takes place and no adequacy decision of the European Commission exists for the destination country, we or Qualtrics Ireland Ltd. have concluded standard contractual clauses of the European Commission with the recipient in the third country as appropriate guarantees to provide for an adequate level of data protection also for the processing in the third country. Information on suitable safeguards may be obtained from the Global Data Privacy Officer.

**2. Processed categories of data:**

- Content of survey.
- Answers given in the course of the survey.
- Net Promoter Score.
- Name and phone number (if given voluntarily)
- Email address (only if we should send you the link to the survey)

**3. Purposes:**

The purpose of the NPS survey is to obtain data about patient satisfaction that we can use to improve our services in accordance with customer agreements, legal requirements and standards that our business is covered by. The data, based on patients' responses, can help us improve our operations and care from the perspective of patient safety, clinical development and quality.

**4. Legal basis:**

The processing of your contact details (email and telephone number) during the first phase of the Patient Experience Feedback survey in order to be able to fill in the questionnaire, is based on our legitimate interest according to Art. 6 para. 1 f GDPR, whereas our legitimate interest is to conduct the survey and contact you thereafter.

The processing of your name, surname and telephone number upon completion of the Patient Experience Feedback survey, which you provide us with at your own discretion, in order for us to contact you back, is based on your consent according to Art. 6 para 1 a GDPR (the “yes, please call me back” button is to be considered consent in this case).

**5. Storage periods or criteria for determination:**

The data is stored for 3 years.

**6. Information on the use of cookies and other technologies**

Please refer to Sec. III.6 above.

**7. Joint Controllorship**

The Ottobock SE & Co. KGaA and the regionally competent Ottobock affiliate will process the information collected in connection with the survey as joint controller in order by evaluating the answers and the score to improve their products and services.

Ottobock SE & Co. KGaA is responsible for operating the survey platform and for data security during processing. The regionally competent Ottobock affiliate is responsible for informing the website visitors/patients about the survey and the opportunity to participate. Ottobock SE & Co. KGaA and the regionally competent Ottobock affiliate both participate in the results of the surveys. I can assert my rights as a data subject against both companies, but Ottobock SE & Co. KGaA is responsible internally.

You may assert your data subject rights in connection with the processing in joint controllership against all responsible parties so that the joint controllership will not lead to any disadvantages for you.

## VI. Your rights

You have the right,

- a) **access** information about this processing (Art. 15 GDPR).
- b) to demand the **rectification** or completion of inaccurate or incomplete data (Art. 16 GDPR);
- c) in certain cases (Art. 17 GDPR) to request the **erasure of** data;
- d) under certain conditions, to request the **restriction of** processing; (Art. 18 GDPR);
- e) under certain conditions to **data portability**, i.e. you may receive your data, which you have provided us with, in a structured, common and machine-readable format or have it transferred to another controller (Art. 20 GDPR);
- f) to **complain** to a **supervisory authority** (Art. 77 GDPR).

### Right to object (Art. 21 GDPR)

**You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you (Art. 6 I lit. f GDPR). This also applies to profiling based on these provisions. We will then no longer process the personal data, unless we can demonstrate compelling legitimate grounds for processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.**

## VII. From whom we receive and to whom we share information

**To the competent regional affiliate company** – the competent regional affiliate company will have access to the survey data, the net promoter score and the results of the analyses via the Qualtrics platform

**To processors** – companies that Ottobock commissions with the processing of data within the legally stipulated framework (Art. 28 GDPR - service provider). In this case Ottobock remains responsible for the protection of your data.

Our processors are carefully selected, are bound by our instructions and are regularly checked by us. We only commission processors who offer sufficient guarantees that suitable technical and organizational measures are taken in such a way, that processing is carried out in accordance with the requirements of GDPR and guaranteeing the protection of your rights. We use external service providers insofar as we cannot or cannot reasonably perform services ourselves.

These external service providers are primarily providers of IT services, such as our hosting, e-mail or telecommunications provider.

### VIII. Obligation to provide data and existence of automated decision-making (including profiling)

You have no contractual or legal obligation to provide us with personal data.

We do not use any automated decision-making, including profiling in accordance with Art. 22 (1) and (4) DSGVO, which would have legal effects on you or affects you similarly.

### IX. Participating Ottobock SE & Co. KGaA's affiliate companies

Entity	Link to Privacy Notice
Dorset Orthopedics (UK)	<a href="http://www.corporate.ottobock.com/en/footer/data-privacy-statement/">www.corporate.ottobock.com/en/footer/data-privacy-statement/</a>
Ottobock Australia	<a href="http://www.spao.com.au/en/security/-/compliance">www.spao.com.au/en/security/-/compliance</a>
Ottobock Brazil	<a href="http://www.ottobock.com/pt-br/privacy/footer">www.ottobock.com/pt-br/privacy/footer</a>
Ottobock China	<a href="http://www.ottobock.com.cn/footer-page-bottom/data-privacy-statement.html#法律声明">www.ottobock.com.cn/footer-page-bottom/data-privacy-statement.html#法律声明</a>
Ottobock Colombia	<a href="http://www.ottobock.com/es-co/aviso-de-privacidad">www.ottobock.com/es-co/aviso-de-privacidad</a>
Ottobock Croatia	<a href="http://www.ottobock.com/hr-hr/pravila-zastite-privatnosti">www.ottobock.com/hr-hr/pravila-zastite-privatnosti</a>
Ottobock France	<a href="http://www.ottobock-ortho.fr/politique-confidentialite/">www.ottobock-ortho.fr/politique-confidentialite/</a>
Ottobock India	<a href="http://www.ottobock.com/en-in/privacy-policy">www.ottobock.com/en-in/privacy-policy</a>
Ottobock Ireland	<a href="http://www.corporate.ottobock.com/en/footer/data-privacy-statement/">www.corporate.ottobock.com/en/footer/data-privacy-statement/</a>
Ottobock Italy	<a href="http://www.ottobock.com/it-it/privacy/gdpr">www.ottobock.com/it-it/privacy/gdpr</a>
Ottobock Kenya	<a href="http://www.corporate.ottobock.com/en/footer/data-privacy-statement/">www.corporate.ottobock.com/en/footer/data-privacy-statement/</a>
Ottobock Morocco	<a href="http://www.ottobock-ortho.fr/politique-confidentialite/">www.ottobock-ortho.fr/politique-confidentialite/</a>
Ottobock North America	<a href="http://www.corporate.ottobock.com/en/footer/data-privacy-statement/">www.corporate.ottobock.com/en/footer/data-privacy-statement/</a>
Ottobock Philippines	<a href="http://www.corporate.ottobock.com/en/footer/data-privacy-statement/">www.corporate.ottobock.com/en/footer/data-privacy-statement/</a>
Ottobock Poland	<a href="http://www.ottobock.com/pl-pl/compliance">www.ottobock.com/pl-pl/compliance</a>
Ottobock Romania	<a href="http://www.ottobock.com/ro-ro/declaratia-de-confidentialitate-a-datelor">www.ottobock.com/ro-ro/declaratia-de-confidentialitate-a-datelor</a>
Ottobock Serbia	<a href="http://www.ottobock.com/sr-rs/izjava-o-privatnosti-podataka">www.ottobock.com/sr-rs/izjava-o-privatnosti-podataka</a>
Ottobock Thailand	<a href="http://www.ottobock.com/en-th/privacy-policy">www.ottobock.com/en-th/privacy-policy</a>
Ottobock Turkey	<a href="http://www.ottobock.com/tr-tr/gizlilik-politikasi">www.ottobock.com/tr-tr/gizlilik-politikasi</a>
Pohlig GmbH	<a href="http://www.pohlig.net/de/legal/datenschutzerklaerung">www.pohlig.net/de/legal/datenschutzerklaerung</a>
VIGO	<a href="http://www.vigogroup.eu/privacy">www.vigogroup.eu/privacy</a>

The contact details for the listed companies may be found at <https://www.ottobock.com/en/company/locations/>

### X. Changes to this privacy policy

We reserve the right to adapt or update this data protection declaration if necessary in compliance with the applicable data protection regulations. In this way, we can adapt it to the current legal requirements and take into account changes to our services, e.g. when introducing new services.

The current version applies to your visit. Date: 14 September 2022