



## for customers, potential customers, suppliers, staff and applicants

The protection of your personal data is very important to us. We therefore process your personal data (abbreviated to “data”) exclusively on the basis of the provisions of law. The purpose of this Data Protection Information is to inform you about the processing of your data in our company and also to inform you in detail about your entitlements and rights under data protection law within the meaning of Article 13 of the European General Data Protection Regulation (GDPR)

### 1. Who is responsible for data processing and who can you contact?

The body responsible for the processing is:

Compressana GmbH Produkte für die Kompressionstherapie  
Böhmerwaldstrasse 3  
93073 Neutraubling  
Phone: +49 9401 92 26-0  
Fax: +49 9401 92 26 -20  
Email: [datenschutz@compressana.de](mailto:datenschutz@compressana.de)  
Represented by its Managing Directors: Klaus Weiss-Mager, Bernd Siegwardt

The Data Protection Officer of COMPRESSANA GmbH is  
Christian Volkmer  
Projekt 29 GmbH & Co. KG  
Ostengasse 14  
93047 Regensburg  
Phone: +49 941 29 86 93 0  
Email: [c.volkmer@projekt29.de](mailto:c.volkmer@projekt29.de)

### 2. What data is processed and where does this data come from?

We process the data which we have obtained from you in the course of the preparation and performance of the contract, as a result of consent we have received from you or in the context of your application to us or your employment by us.

#### Personal data includes:

Your master data / contact data which in the case of **customers, potential customers and suppliers** includes, for example, your given name and family name, address, contact data (email address, phone and fax number), data from the proof of identity you have submitted, register extracts and business registration, the name of your legal representatives, company name, VAT registration number, bank data and health data.



In the case of **applicants and staff**, the data includes, for example, given name and family name, address, contact data (email address, phone and fax number), date of birth, data from your CV and employment references, bank data and religious denomination.

We also process the following miscellaneous personal data:

- In the case of orders with additional information (name, number, other text from the order) if relevant with additional personal size and manufacturing data, if appropriate any illness-related indications and if relevant in the case of a complaint (if appropriate, photos) with health-related background (e.g. intolerances, disabilities)
- Information on the nature and content of contractual data, order data, sales and receipt data, customer and supplier history as well as documents relating to advice, promotional and marketing data,
- Data from sources and registers open to the general public (e.g. pharmacists' register),
- Documentation data (e.g. consultation minutes), images,
- information drawn from your electronic communications (e.g. IP address and log-in data),
- Miscellaneous data we have gathered from you in the course of our business relationship (e.g. in meetings with customers),
- Data which we ourselves create from master data and contact data, for example from analyses of customer requirements and customer potentials,
- The record of your statement of consent for receipt of information e.g. newsletters.

### 3. For what purposes is the data processed and on what legal basis?

We process your data in accordance with the provisions of the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act 2018, as amended.

- **to comply with (pre)contractual obligations (Article 6 (1)(b) GDPR):**  
 The data is processed for the fulfilment of your contract for care in one of our branches or the fulfilment of your contract of employment with our company. The data is processed in particular on the occasion of the commencement of business with you and the performance of the contracts with you.
- **to comply with legal obligations (Article 6 (1)(c) GDPR):**  
 It is necessary to process your data to comply with various legal obligations, for instance obligations required by the German Commercial Register or the German Tax Code, and specific provisions such as those of the German Nursing Care Act (Pflegegesetz).
- **to protect legitimate interests (Article 6 (1)(f) GDPR):**  
 The balancing of interests can allow data processing to extend beyond the actual performance of the contract to include the protection of our legitimate interests or those of a third party. Data is processed, for example, to protect legitimate interests in the following cases:
  - Promotion or marketing (see Clause 4)
  - Activities for business management and enhancement of services and products;
  - Maintenance of a customer data-base to improve customer service - as part of litigation



- **if you have given your consent (Article 6 (1)(a) GDPR)**

If you have given us your consent to process your data, the data is only processed for the purposes defined in the statement of consent and to the extent specified in the statement of consent. Consent you have given may be revoked at any time with effect for the future e.g. consent for sending our newsletter.

#### 4. Processing of personal data for promotional purposes

You may object to the use of your personal data for promotional purposes for all activities or specific activities at any time without it costing more than the transmission costs at the base rates.

Subject to the conditions of § 7(3) of the German Unfair Competition Act (Unlauterer Wettbewerbs-Gesetz), we are entitled to use the email address you indicated at the time of the conclusion of the contract for direct promotion of our own goods or services. You will receive these product recommendations irrespective of whether you have subscribed to a newsletter or not.

If you do not wish to receive recommendations of this nature by email from us, you can object to the use of your address for this purpose at any time without it costing more than the transmission costs at the base rates. This objection must be in written form. Each email always contains, of course, an unsubscribe link.

Certain items of personal data including the IP address of the persons visiting our website are processed via our website. You will find supplementary statements on data protection on the on-line sites of Compressana, e.g. [www.compressana.de](http://www.compressana.de).

#### 5. Who receives my data?

If we engage a service-provider for the purpose of sub-contract processing an order, we nevertheless remain responsible for the protection of your data. All sub-contract processors are contractually obliged to treat your data as confidential and only to process it within the scope of the performance of the service. The sub-contract processors we have engaged receive your data in so far as they need the data for the performance of the specific service for which they were engaged. These are, for example, IT service-providers we need for the operation and security of our IT system as well as publishers of commercial printed matter and directory publishers for our own promotional campaigns.

Public authorities, courts and external auditors can receive your personal data if a legal obligation exists or in the course of litigation.

Insurance companies, banks, credit agencies and service-providers may also receive your data for the purpose of the preparation of a contract and the contract's performance.



## 6. How long is my data stored for?

We process your data up to the end of the business relationship or the end of the applicable statutory retention periods (for example as required by the German Commercial Code, Tax Code, Home Act (Heimgesetz) or Working Hours Act (Arbeitszeitgesetz); your data is also retained up to the conclusion of any litigation in which the data is needed as evidence.

## 7. Is personal data transferred to a third country?

In principle we transfer no data to a third country. Data is only transferred to third countries in particular cases, and then the transfer is subject to an adequacy decision of the European Commission, standard contractual clauses, suitable guarantees or your express consent.

## 8. What data protection rights do I have?

You have a right at any time of information, rectification, erasure or restriction of the processing of your data that has been saved; you also have a right to object to the processing, a right of data portability and a right to complain in accordance with the provisions of data protection law.

### **The right to be informed:**

You may ask us for information whether and to what extent we process your data.

### **The right to rectification:**

If we process your data and the data is incomplete or incorrect, you may demand at any time that we correct or complete the information.

### **The right to erasure:**

You may demand that we delete your data if we are processing this unlawfully or if the processing interferes disproportionately with your legitimate protected interests. Please note that there can be reasons why the data cannot be immediately erased, for instance in the case of legally mandated retention periods. Irrespective of the protection of your rights of erasure, we will promptly erase your data in full if no relevant legal or statutory retention period prevents erasure.

### **The right of restriction of processing:**

You may demand that we restrict the processing of your data if

- you contest the accuracy of the data; the restriction will be for the duration of the period which enables us to verify the accuracy of the data;
- the processing of the data is unlawful but you do not require erasure and instead demand a restriction of the use of the data;
- we no longer need the data for the anticipated purpose but you need this data to assert or defend against legal claims, or
- you have registered an objection to the processing of the data.



### **The right to data portability:**

You may require that we make the data you have supplied to us available in a structured, commonly used and machine-readable format, and that you can transfer this data to another controller without hindrance from us where

- we are processing this data based on a revocable consent you have given or for the performance of a contract between us, and
- this processing is carried out by automated processes.

If it is technically feasible you can request that we transfer your data directly to another controller.

### **The right to object:**

If we process your data as a result of our legitimate interest, you can object to this processing at any time; this would also apply to any profiling based on these provisions. We will then no longer process your data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims. You can object to the processing of your data for direct marketing purposes without giving any reasons.

### **The right to complain:**

If you are of the opinion that when processing your data we are infringing German or European data protection law, please contact us so that the matter can be clarified. You also have, of course, the right to contact the supervisory authority competent for you, the relevant State Data Protection Authority (Landesamt für Datenschutzaufsicht).

If you wish to assert one of the above-mentioned rights against us, please contact our Data Protection Officer. In the event of doubt, we may request additional information to confirm your identity.

## **9. Am I obliged to provide data?**

It is necessary to process your data to conclude and perform the contract we have received from you. If you do not provide us with this data, we will normally be obliged to decline to conclude the contract, or we will no longer be able to perform an existing contract and must consequently terminate it. However, you are not obliged to consent to data processing that is irrelevant for the performance of the contract or not required by law.

Version 13.08.2021