

Privacy policy

for the Impf-Finder App when used by a medical practice or vaccination centre

With the following information we would like to outline the processing of your data and your data protection rights when using the Impf-Finder App in your role as a medical practice / vaccination centre.

1. Who is responsible and whom can I contact?

The following entity is responsible for data processing within the meaning of the General Data Protection Regulation (hereinafter referred to as "GDPR") and is the publisher of the Impf-Finder App:

Randstad Deutschland GmbH & Co.KG (hereinafter referred to as "Randstad" or "We")
Helfmann-Park 8
65760 Eschborn
Germany
Telephone: + 49 (0) 61 96 - 408 0
E-mail: presse@randstad.de

If you have any questions about this privacy policy or wish to exercise your rights, you can contact our data protection officer at any time at datenschutz@randstad.de or at the aforementioned postal address with the addition "Attn: Data Protection Officer".

2. I am interested in vaccination and want a vaccination appointment. What applies to me?

If you use the Vaccination Finder App as an individual requesting vaccination, you will be subject to the separate privacy policy displayed during the appointment booking process.

3. What data do we process?

We process the following categories of data, which may be personal data if you are a natural person:

- **Access data** that is inevitably processed when data is exchanged.
 - IP address
 - Date and time of the request
 - Time zone difference from Greenwich Mean Time (GMT)
 - Access status / HTTP status code
 - Data volume transferred in each case
 - Operating system und version
- **Password for the Impf-Finder App**
- **Medical practice data**
 - Salutation and name (first name, surname)
 - Address of the medical practice
 - Lifelong physician number ("LANR")
 - Business premises number ("BSNR")

- E-mail address
- Telephone number
- **Vaccination appointments**
 - Available vaccine type and quantity
 - Available vaccination appointment dates
 - Vaccination group number
- **Vaccination appointment data with QR code / booking number** if a vaccination appointment has been booked

4. What do we process your data for?

The Impf-Finder App is designed to support and speed up the management of the vaccination process by matching individuals who are looking for a vaccination appointment and type of vaccine with doctors and vaccination centres. For this overarching purpose we process data in the context of using the Impf-Finder App.

Specifically, we process your data for the following purposes:

4.1 Entering available vaccination dates

As soon as you start the Impf-Finder App, you may opt to register for participation in the Vaccination Finder via the “Don't have an account? Please register here” button. For this we need some data to validate your activity as a doctor and to provide the address of your medical practice for individuals requesting vaccination.

Your details will then be validated and we will contact you by phone and e-mail to verify the authenticity of your registration. You will then be informed by e-mail about the success of your registration. You can then enter the available vaccination doses, vaccination dates and intervals for vaccinations.

We then use the data collected in this way to allow individuals requesting vaccination to find and select a vaccination appointment, together with the address and name of your medical practice.

4.2 Appointment and authentication of the individual requesting vaccination

Since no data is collected for appointment reservations that directly identifies the individual requesting vaccination (such as name, e-mail or telephone number), an alternative form of authentication is required.

For this authentication, we generate a QR code and booking number and transmit both to you and the individual requesting vaccination. In order for you to check the eligibility of the individual requesting vaccination when they show up at your practice, you will need to scan the generated QR code from the person's smartphone or alternatively enter the booking number displayed in your Impf-Finder App.

When the QR code has been scanned or the booking number has been entered, the appointment, the QR code and the booking number for the vaccination dose will no longer be available for other people. This ensures that the QR code or booking number cannot be presented to you by anyone else interested in vaccination and that the corresponding appointment will not be made available again.

4.3 Server communication and security

When using the Impf-Finder App, your access credentials are processed in order to enable, maintain and secure the operation of the Impf-Finder App. This is the only way that the Impf-Finder App can display free appointments to those interested in vaccination and retrieve the appointments that are available at your location.

5. On what legal basis do we process your data?

We process your data in order to initiate a contractual relationship between you or your employer and Randstad, provided that no contract for the use of the Impf-Finder App has been concluded to date. If a contract has already been concluded between you or your employer and Randstad for the use of the Impf-Finder App, your personal data will be processed for the fulfilment and management of this use.

If we wish to conclude or have already concluded a contract with you directly, the legal basis for this data processing is the fulfilment of contractual obligations and/or the implementation of pre-contractual measures pursuant to Art. 6 para. 1 lit. b GDPR.

As a rule, however, you as the contact person are not the person with whom we want to conclude or have already concluded the contract, but the employer, i.e. the medical practice or the vaccination centre for which you work. This means that you have introduced yourself as a contact person for your employer or have been nominated by your employer as our contact person. In this case, Randstad has a legitimate interest in processing your personal data to enable the initiation, fulfilment and settlement of the use of the Impf-Finder App with your employer. Accordingly, the legal basis for this data processing is the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR.

In addition, we are partially subject to legal requirements, which may require processing for the purposes of fraud prevention, law enforcement and the fulfilment of retention and reporting obligations. The legal basis for this data processing is in each case a legal obligation within the meaning of Art. 6 para. 1 lit. c GDPR or public interest in accordance with Art. 6 para. 1 lit. e GDPR.

6. Who receives your data?

Within Randstad, access to your personal data will only be granted to those entities that have a compelling need to know in order to fulfil the above purposes.

If you receive an appointment booking for a vaccination via the Impf-Finder App, then in addition to the address and the name of your medical practice, the individual requesting vaccination will only be informed when an appointment has been made and a QR code and booking number has been created for this purpose, which you can use for validation.

The aforementioned data may also be processed by service providers who operate or maintain the technical infrastructure (i.e. in particular the servers for communication with the Impf-Finder App). An order processing agreement has been concluded with these service providers insofar as they act as data processors for us.

Betrieb und Wartung erfolgen dabei primär durch die Randstad Global IT Solutions B.V., Randstad N.V. und Outsystems Inc., GULP Solution Services GmbH & Co. KG, Randstad II Limitada.

Apart from the purposes outlined above, your data will only be transferred to third parties if we are legally obliged to do so or if this is necessary for legal or criminal prosecution.

7. Will data be transferred to countries outside the European Union?

The data transmitted by the Impf-Finder App is stored on servers in the European Union.

If support services are provided by service providers, however, it may also be necessary to transfer data to countries outside the European Union and the European Economic Area (so-called third countries) in order to maintain the functionality of the infrastructure used. For some of these third countries, in particular the United States of America (hereinafter referred to as "USA"), no adequate level of data protection has been determined by the European Commission. These third countries therefore do not offer data protection law comparable to that of the European Union. As a result, there is a risk that your European data protection rights may not be enforced or that authorities in

third countries may access and use the transferred data even though this is not compatible with European data protection law and even though we have not given our consent to such use.

The appropriate safeguards for data transfers to third countries are achieved by concluding so-called EU standard contractual clauses pursuant to Art. 46 para. 2 lit. c GDPR, each of which has been supplemented by additional measures where an equivalent level of protection is lacking because authorities in the third country can access the exported data in a disproportionate manner and there is no effective legal protection against this.

8. When will my data be deleted?

We process and store your personal data for as long as is necessary for the purposes for which it was collected (in particular the performance of the contract). If the processing of your personal data is no longer necessary for us, we will delete it unless its further processing is required for legal reasons.

These legal reasons include, for example, retention obligations under commercial and tax law (from the German Commercial Code and the German Fiscal Code). The periods specified there for the retention of data are generally two to ten years.

Furthermore, we may need your data for evidentiary purposes. With regard to this data, it is usually deleted after the expiry of the statute of limitations; the regular statute of limitations of the German Civil Code is three years.

This results in the following:

Access credentials are stored for up to nine weeks after collection. The vaccination appointment data with QR code / booking number will be deleted when the appointment is cancelled or expires or the QR code is scanned. All other data will be retained as long as you participate in the Impf-Finder App. If you no longer wish to participate in the Impf-Finder App as a doctor, you also have the option of deleting all other data via the Impf-Finder App. We will then delete the data from our systems without delay, unless there are legal obligations or rights to retain the data.

9. What other rights do you have?

In addition to the possibility of revoking your consent, you have the following data protection rights:

Right of access. You have the right to access the personal data we hold about you to review it and understand how we use your data.

Right of rectification, erasure and restriction. You have the right in certain circumstances to request that we rectify, restrict or erase your personal data.

Right to withdraw consent. You have the right to withdraw any consent you may have given. Please note that this withdrawal of consent does not affect the permissibility of data processing until your withdrawal.

Right to data portability. You have the right to receive your personal data from us in a structured, common and machine-readable format and to have it transferred directly from us to third parties, insofar as this is technically feasible.

Right to object. You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data relating to you which is carried out on the basis of our legitimate interests under Article 6 (1) lit. f GDPR. We will then no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing.

Right to lodge a complaint. You also have the right to complain to a data protection supervisory authority about the processing of your personal data by us. So, for example, if you think that our data processing violates the GDPR, you can file a complaint with a supervisory authority. For example, the supervisory authority of the federal state in which you reside is

responsible for this. You can find a list of all state data protection officers in Germany and their contact details at the following link https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html. You can also contact the Hessian Commissioner for Data Protection and Freedom of Information, Postfach 3163, 65021 Wiesbaden, who is responsible for us.

10. Is there an obligation to provide personal data?

You are neither legally nor contractually obliged to provide us with personal data. However, without this data we are in some cases not able to offer all functionalities of the Impf-Finder App. The use of the Impf-Finder App is therefore voluntary. It is solely your decision whether you install and use the Impf-Finder App, in particular whether you enter available vaccination appointments into the system.

11. Does automated decision-making or profiling take place?

We do not make automated decisions or carry out other profiling measures.