

Privacy policy for the Impf-Finder App

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 as an individual requesting vaccination.

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. Who can use the Impf-Finder App?

1. The Impf-Finder App is aimed at all persons interested in vaccination against COVID-19 in Germany from a minimum age of 16 years.

3. I am a doctor or a member of his/her staff and I want to support. What applies to me?

Should you use or be interested in supporting the Impf-Finder App as a doctor (or his/her employees) connected to the Impf-Finder App, a separate privacy policy applies to you and will be displayed during the registration process.

4. What data do we process?

The Impf-Finder App is designed in such a way that as little or no personal data as possible is processed. In particular, it is not possible for Randstad to infer your name or e-mail address through the use of the Impf-Finder App. This also means that even to arrange a binding vaccination appointment, you do not need to provide us or the selected medical practice with your name or full address via the Impf-Finder App.

The following categories of data are processed by us:

- **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
- **Installation ID (GUID)** to ensure that the instance is not misused on a larger scale for fake appointment creation and appointment blocking. Only a limited number of appointment bookings are possible per installation ID.
- **Location** required to find a free vaccine dose.
 - If you use automatic location detection, your exact location is still masked on your smartphone by a random offset of the x and y coordinates, which means we do not know your exact location.
 - If you enter your location manually, it is sufficient to enter the postcode and/or the street. We do not need your exact address, which means that we do not know your exact location in this case either.
- **Vaccination appointment data** if you have booked a vaccination appointment
 - GUID (mapped to a DB ID)
 - Vaccination group number (provided by the doctor)
 - QR code / booking number
 - QR code / booking number validated by the doctor
 - Doctor's address

5. What do we process your data for and on what legal basis?

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:

5.1 Proximity search

As soon as you start the Impf-Finder App, you can use the “Find me a vaccination” button to search for available vaccination doses and corresponding vaccination appointments within a radius defined by you around your location (hereinafter referred to as “proximity search”).

For this purpose, we offer the option of using the location automatically detected by your smartphone to simplify the proximity search, provided you give your smartphone permission to do so. The use of this function is optional; there is no obligation to automatically detect locations. However, we would like to point out that even if you use this function, your exact location will be masked locally on your smartphone and only an approximate location will be transmitted to us. If you enter your location manually, it is sufficient to enter the postcode and/or the street.

In the next step, you have the option of selecting your preferred vaccine or all approved vaccines from the list of approved COVID-19 vaccines, as well as limiting the date and the radius of your search.

We then use the data collected in this way to carry out the proximity search. This data is not stored permanently. The legal basis for the processing is your consent pursuant to Art. 6 para. 1 sentence 1 lit. a DSGVO, if and insofar as data concerning health is involved pursuant to Art. 9 para. 2 lit. a GDPR. You can revoke this consent at any time for the future (see point 9 below).

5.2 Scheduling an appointment and authenticating with the doctor

After selecting and reserving a suitable vaccination appointment, the Impf-Finder App forwards the GUID to our servers and uses it to reserve the appointment available with the doctor.

As this appointment booking does not require any data from which your identity can be directly derived, such as your name, e-mail address or telephone number, an alternative form of authentication to the doctor is required so that you can prove that you have actually booked the vaccination appointment and reserved the free vaccine dose. You will receive the QR code or booking number generated on our servers after your final confirmation of the appointment.

In order for you to attend your vaccination appointment and for the doctor to check your eligibility, you must have this QR code or booking number checked by your doctor.

When the QR code has been scanned by your doctor or the booking number has been entered, the appointment and the QR code / booking number for the vaccine dose will no longer be available for other people.

The legal basis for the processing is your consent pursuant to Art. 6 para. 1 sentence 1 lit. a DSGVO, if and insofar as data concerning health is involved pursuant to Art. 9 para. 2 lit. a GDPR. You can revoke this consent at any time for the future (see point 9 below).

5.3 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 and to protect it from misuse. This is the only way that the Impf-Finder App can retrieve free appointments with doctors in your area and transmit to us the preferences you have entered for the proximity search.

The IP address can at no time be linked to your GUID by us. It is therefore not possible to identify you personally.

The GUID is required to prevent misuse of the Impf-Finder App, as this is the only way to ensure that free appointments are not blocked on a large scale. Only a limited number of appointment bookings are possible per GUID.

The legal basis for the processing is our legitimate interest pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR to prevent and be able to detect misuse of the Impf-Finder App.

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 schedule an appointment for a vaccination via the Impf-Finder App, then the medical practice will only be informed of the time and date of the appointment and will receive a QR code and booking number, which can be used for validation by the medical practice.

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., 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") and India, 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. 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.

This results in the following storage durations:

- **Vaccination dates:** Upon cancellation of the appointment or expiry of the appointment or when the QR code has been scanned by the doctor.
- **GUID:** up to four weeks after the expiry of the last appointment booked through the GUID.
- **Access credentials:** up to nine weeks.

All other data, i.e. in particular the location, is only stored temporarily and not permanently by us on our systems.

9. How can I withdraw my consent?

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

You can exercise your right to withdraw consent by selecting the option "Erase all data" in the settings of the Impf-Finder App. Appointments that have already been arranged are automatically cancelled, all data is deleted, and data processing is terminated.

10. 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 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.

However, we would like to point out that - with the exception of the complaint - it is generally not possible to fulfil these rights, because further personal data would have to be collected via the Impf-Finder App for this purpose, which would allow you personally or your smartphone to be uniquely identified. However, this is not intended by Randstad as we strive to use data as sparingly as possible, and it is not necessary for the purposes pursued with the Impf-Finder App. Therefore, we will regularly not be able or obliged to fulfil these rights (see Art. 11 GDPR).

11. 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 and whether data is collected with your consent. If you do not give consent or if you withdraw your consent, this will not result in any disadvantages for you.

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

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