

Privacy Policy
of
Oncosia Scientific GmbH
Dorfstr. 19, 91602 Dürrwangen

1. Introduction

In the following, we provide information about the processing of personal data when using

- our Oncosia website <https://www.oncosia.de/> and our Oncoprevia platform
- our profiles in social media.

Personal data is all data that can be related to a specific natural person, e.g. their name or IP address.

1.1 Contact details

The controller pursuant to Art. 4 (7) of the EU General Data Protection Regulation (GDPR) is Oncosia Scientific GmbH, Dorfstr. 19, 91602 Dürrwangen, Germany, e-mail: mail@oncosia.de. We are legally represented by Nico Schürle.

Our data protection officer can be contacted via heyData GmbH, Schützenstraße 5, 10117 Berlin, www.heydata.eu, e-mail: datenschutz@heydata.eu.

1.2 Scope of data processing, processing purposes and legal bases

The scope of data processing, processing purposes and legal bases are explained in detail below. The following legal bases for data processing can generally be considered:

- Art. 6 para. 1 s. 1 lit. a GDPR serves as the legal basis for processing operations for which we obtain consent.
- Art. 6 para. 1 s. 1 lit. b GDPR is the legal basis insofar as the processing of personal data is necessary for the performance of a contract, e.g. if a site visitor purchases a product from us or we perform a service for them. This legal basis also applies to

processing that is necessary for pre-contractual measures, for example in the case of inquiries about our products or services.

- Art. 6 para. 1 s. 1 lit. c GDPR applies if we fulfill a legal obligation by processing personal data, as may be the case in tax law, for example.
- Art. 6 para. 1 s. 1 lit. f GDPR serves as the legal basis if we can rely on legitimate interests to process personal data, e.g. for cookies that are required for the technical operation of our website.

1.3 Data processing outside the EEA

Insofar as we transfer data to service providers or other third parties outside the EEA, adequacy decisions of the EU Commission pursuant to Art. 45 para. 3 GDPR guarantee the security of the data during transfer, insofar as these exist, as is the case, for example, for the UK, Canada and Israel.

In the case of data transfer to service providers in the USA, the legal basis for data transfer is an adequacy decision by the EU Commission if the service provider is also certified under the EU-US Data Privacy Framework.

In other cases (e.g. if there is no adequacy decision), the legal basis for data transfer is usually standard contractual clauses, i.e. unless we indicate otherwise. These are a set of rules adopted by the EU Commission and form part of the contract with the respective third party. According to Art. 46 para. 2 lit. b GDPR, they guarantee the security of data transfer. Many of the providers have issued contractual guarantees that go beyond the standard contractual clauses and protect the data beyond the standard contractual clauses. These are, for example, guarantees regarding the encryption of the data or regarding the obligation of the third party to inform the data subject if law enforcement agencies wish to access data.

1.4 Storage period

Unless expressly stated in this privacy policy, the data stored by us will be deleted as soon as it is no longer required for its intended purpose and the deletion does not conflict with any statutory retention obligations. If the data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted, i.e. the data will be blocked and not processed for other purposes. This applies, for example, to data that we must retain for commercial or tax law reasons.

1.5 Rights of the data subjects

Data subjects have the following rights vis-à-vis us with regard to their personal data:

- Right to information,
- Right to rectification or erasure,
- Right to restriction of processing,
- Right to object to the processing,
- Right to data portability,
- Right to withdraw consent at any time.

Data subjects also have the right to complain to a data protection supervisory authority about the processing of their personal data. Contact details of the data protection supervisory authorities can be found at <https://www.bfdi.bund.de/DE/Service/Anschriften/Laender/Laender-node.html>.

1.6 Obligation to provide data

In the context of a business relationship or other relationship, customers, interested parties or third parties must only provide us with the personal data that is necessary for the establishment, execution and termination of the business relationship or for the other relationship or that we are legally obliged to collect. Without this data, we will generally have to refuse to conclude a contract or provide a service or will no longer be able to perform an existing contract or other relationship.

Mandatory information is marked as such.

1.7 No automated decision-making in individual cases

In principle, we do not use fully automated decision-making in accordance with Article 22 GDPR to establish and implement a business relationship or other relationship. If we use these procedures in individual cases, we will provide separate information about this if this is required by law.

1.8 Making contact

When you contact us, e.g. by email or telephone, the data you provide us with (e.g. names and email addresses) will be stored by us in order to answer your questions. The legal basis for the processing is our legitimate interest (Art. 6 para. 1 s. 1 lit. f GDPR) in answering inquiries addressed to us. We delete the data collected in this context after storage is no longer necessary or restrict processing if there are statutory retention obligations.

1.9 Customer surveys

From time to time, we conduct customer surveys to get to know our customers and their wishes better. We collect the data requested in each case. It is our legitimate interest to get to know our customers and their wishes better, so that the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit. f GDPR. We delete the data once the results of the surveys have been evaluated.

2. Newsletter

We reserve the right to inform customers who have already used our services or purchased goods about our offers from time to time by email or other means if they have not objected to this. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f GDPR. Our legitimate interest lies in direct advertising (Recital 47 GDPR). Customers can object to the use of their email address for advertising purposes at any time at no additional cost, for example via the link at the end of each email or by sending an email to our email address stated above.

3. Data processing on our website

3.1 Note for website visitors from Germany

Our website stores information in the terminal equipment of website visitors (e.g. cookies) or accesses information that is already stored in the terminal equipment (e.g. IP addresses). Please refer to the following sections to find out what information this is in detail.

This storage and access takes place on the basis of the following provisions:

- Insofar as this storage or access is absolutely necessary for us to provide the service expressly requested by website visitors on our website (e.g. to implement a chatbot used by the website visitor or to ensure the IT security of our website), it is carried out on the basis of Section 25 (2) No. 2 of the Telecommunications Digital Services Data Protection Act (TDDDG).
- Otherwise, this storage or access is based on the consent of the website visitor (Section 25 (1) TDDDG).

Downstream data processing is carried out in accordance with the following sections and on the basis of the provisions of the GDPR.

3.2 Informational use of the website

When the website is used for informational purposes, i.e. when visitors to the site do not send us information separately, we collect the personal data that the browser transmits to our server in order to ensure the stability and security of our website. This is our legitimate interest, so the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

These data are:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request comes
- Browser
- Operating system and its interface
- Language and version of the browser software.

This data is also stored in log files. They are deleted when their storage is no longer required, at the latest after 14 days.

3.3 Web hosting and provision of the website

Our website is hosted by Heroku Felix. The provider is salesforce.com Germany GmbH, Erika-Mann-Straße 31-37, 80636 Munich, Germany. The provider processes the personal data transmitted via the website, e.g. content, usage, meta/communication data or contact data, in the EU. Further information can be found in the provider's privacy policy at <https://www.salesforce.com/de/company/privacy/>.

It is our legitimate interest to provide a website, so that the legal basis for the data processing described is Art. 6 para. 1 s. 1 lit. f GDPR.

3.4 Job advertisements

We publish job advertisements on our website, on pages linked to the website or on third-party websites.

The data provided as part of the application is processed in order to carry out the application process. Insofar as this is necessary for our decision to establish an employment relationship, the legal basis is Art. 88 para. 1 GDPR in conjunction with Section 26 para. 1 BDSG. We have marked the data required to carry out the application process accordingly or refer to it. If applicants do not provide this data, we will not be able to process the application.

Further data is voluntary and not required for an application. If applicants provide further information, this is based on their consent (Art. 6 para. 1 s. 1 lit. a GDPR).

We ask applicants to refrain from providing information on political opinions, religious beliefs and similar sensitive data in their CV and cover letter. They are not required for an application. If applicants nevertheless provide such information, we cannot prevent their processing as part of the processing of the CV or cover letter. Their processing is then also based on the consent of the applicants (Art. 9 para. 2 lit. a GDPR).

Finally, we process applicants' data for further application procedures if they have given us their consent to do so. In this case, the legal basis is Art. 6 para. 1 s. 1 lit. a GDPR.

We pass on applicants' data to the responsible employees in the HR department, to our processors in the area of recruiting and to the other employees involved in the application process.

If we enter into an employment relationship with the applicant following the application process, we will only delete the data after the employment relationship has ended. Otherwise, we will delete the data no later than six months after rejecting an applicant.

If applicants have given us their consent to use their data for further application procedures, we will only delete their data one year after receipt of the application.

3.5 Third-party providers

3.5.1 Google Analytics

We use Google Analytics for analysis. The provider is Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. The provider processes usage data (e.g. websites visited, interest in content, access times) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. a GDPR. Processing is carried out on the basis of consent. Data subjects can withdraw their consent at any time, e.g. by contacting us using the contact details provided in our privacy policy. The revocation does not affect the legality of the processing until the revocation.

The legal basis for the transfer to a country outside the EEA is an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided that the third country offers an adequate level of protection as part of an adequacy decision in accordance with Art. 45 (3) GDPR.

The data will be deleted when the purpose of its collection no longer applies and there is no obligation to retain it. Further information can be found in the provider's privacy policy at <https://policies.google.com/privacy?hl=de>.

4. Oncoprevia platform

4.1 Note for website visitors from Germany

Our website stores information in the terminal equipment of website visitors (e.g. cookies) or accesses information that is already stored in the terminal equipment (e.g. IP addresses). Please refer to the following sections to find out what information this is in detail.

This storage and access takes place on the basis of the following provisions:

- Insofar as this storage or access is absolutely necessary for us to provide the service expressly requested by website visitors on our website (e.g. to implement a chatbot used by the website visitor or to ensure the IT security of our website), it is carried out on the basis of Section 25 (2) No. 2 of the Telecommunications Digital Services Data Protection Act (TDDDG).
- Otherwise, this storage or access is based on the consent of the website visitor (Section 25 (1) TDDDG).

Downstream data processing is carried out in accordance with the following sections and on the basis of the provisions of the GDPR.

4.2 Informational use of the website

When the website is used for informational purposes, i.e. when visitors to the site do not send us information separately, we collect the personal data that the browser transmits to our server in order to ensure the stability and security of our website. This is our legitimate interest, so the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

These data are:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case

- Website from which the request comes
- Browser
- Operating system and its interface
- Language and version of the browser software.

This data is also stored in log files. They are deleted when their storage is no longer required, at the latest after 14 days.

4.3 Web hosting and provision of the website

Our website is hosted by Ionos Cloud. The provider is IONOS SE, Elgendorfer Str. 57, 56410 Montabaur, Germany. The provider processes the personal data transmitted via the website, e.g. content, usage, meta/communication data or contact data, in the EU. Further information can be found in the provider's privacy policy at <https://www.ionos.de/terms-gtc/datenschutzerklaerung/>.

It is our legitimate interest to provide a website, so that the legal basis for the data processing described is Art. 6 para. 1 s. 1 lit. f GDPR.

4.4 Customer account

Visitors to the website can open a customer account on our website. We process the data requested in this context on the basis of the contract concluded with the website visitor. The legal basis for the processing is therefore Art. 6 para. 1 s. 1 lit. b GDPR.

4.5 Technically necessary cookies

Our website uses cookies. Cookies are small text files that are stored in the web browser on the end device of a site visitor. Cookies help to make the website more user-friendly, effective and secure. Insofar as these cookies are necessary for the operation of our website or its functions (hereinafter referred to as "technically necessary cookies"), the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing customers and other site visitors with a functional website.

Specifically, we set technically necessary cookies for the following purpose or purposes:

- Cookies that store log-in data

- Security cookies

4.6 Early detection of cancer

As part of our platform for early cancer detection, we process personal data such as name, date of birth, email address and address as well as health data of various kinds (e.g. risk factors, family history, personal previous illnesses, medical findings). The platform is used to identify cancer risks and create individual screening plans and acts as an oncological EHR system.

The legal basis is the contract concluded with the user. The legal basis for this processing is Art. 6 para. 1 s. 1 lit. b GDPR. For the processing of health data, Art. 9 para. 2 lit. a GDPR also applies, based on the consent of the data subject. This consent can be withdrawn at any time, e.g. by contacting us using the contact details provided in our privacy policy. The revocation does not affect the legality of the processing carried out until the revocation.

5. Data processing on social media platforms

We are represented on social media networks in order to present our organization and our services. The operators of these networks regularly process their users' data for advertising purposes. Among other things, they create user profiles from their online behavior, which are used, for example, to display advertising on the pages of the networks and elsewhere on the Internet that corresponds to the interests of the users. For this purpose, the network operators store information on user behavior in cookies on the user's computer. It is also possible that the operators may combine this information with other data. Users can find further information and information on how users can object to processing by the site operators in the privacy policies of the respective operators listed below. It is also possible that the operators or their servers are located in non-EU countries, meaning that they process data there. This may result in risks for users, e.g. because the enforcement of their rights is made more difficult or government agencies gain access to the data.

When users of the networks contact us via our profiles, we process the data provided to us in order to respond to the inquiries. This is our legitimate interest, so the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

5.1 Instagram

We maintain a profile on Instagram. The operator is Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: <https://help.instagram.com/519522125107875>.

5.2 Tiktok

We maintain a profile on Tiktok. The operator is TikTok Technology Limited, whose registered office is at 10 Earlsfort Terrace, Dublin, D02 T380, Ireland. The privacy policy is available here: <https://www.tiktok.com/de/privacy-policy>.

5.3 YouTube

We maintain a profile on YouTube. The operator is Google Ireland Limited Gordon House, Barrow Street Dublin 4, Ireland. The privacy policy is available here: <https://policies.google.com/privacy?hl=de>.

5.4 LinkedIn

We maintain a profile on LinkedIn. The operator is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. The privacy policy is available here: https://https://www.linkedin.com/legal/privacy-policy?_l=de_DE. You can object to data processing via the settings for advertisements: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

6. Changes to this privacy policy

We reserve the right to amend this privacy policy with effect for the future. A current version is always available here.

7. Questions and comments

If you have any questions or comments regarding this privacy policy, please do not hesitate to contact us using the contact details above.

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