

## PRIVACY POLICY FOR THE ERBE LEARNING SUITE

The protection of personal data is important to us. Erbe takes all necessary technical and organizational security measures to protect personal data from loss and misuse. Information on which personal data is collected and how it is used is provided below.

### 1. Responsible Body/Data Protection

#### 1.1 Responsible body pursuant to Art. 4(7) GDPR

The data controller within the meaning of the GDPR is

Erbe Elektromedizin GmbH  
Waldhörnlestraße 17  
72072 Tübingen  
Germany  
Phone: +49 7071/755 - 0  
Email: [datenschutz@erbegroup.com](mailto:datenschutz@erbegroup.com)

Represented by the managing director Christian O. Erbe

#### 1.2 Data Protection Officer

We have appointed a data protection officer for our company in accordance with Art. 37 GDPR. You can contact him as follows:

Walliser Consulting GmbH  
Altenwaldstraße 8  
72768 Reutlingen  
Phone: +49 7121/69 702 - 26  
Email: [datenschutz@walliser-datenschutz.de](mailto:datenschutz@walliser-datenschutz.de)

### 2. Collection, Processing, Use, and Disclosure of Personal Data

#### 2.1 Purpose of Processing

2.1.1 Personal data is collected, processed and used in accordance with the provisions of the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG). Accordingly, Erbe may collect, process and use personal data insofar as this is necessary for the establishment and drafting of contracts, for the provision of services, for the sale of products, or for the purposes of training, pursuant to Arts. 6 (1) (b), (c), and (f) GDPR.

#### 2.1.2 The data collected is as follows:

- Name (first and last)
- Email address
- Telephone number
- Profile information
- Country
- Time zone

- IP address
- Log information
- Images, if uploaded by the user
- Information on courses taken by the data subject
- Learning progress of the data subject
- Login data
- Institution
- Job title
- Date of registration
- LMS user ID
- Preferred language

2.1.3 The purpose of processing is as follows:

- Providing training content through a Learning Management System
- Organizing learning processes
- Supporting learning scenarios
- Tracking learning progress
- Facilitating communication between learners and instructors
- Allowing users to access and download information on their trainings/training certificates
- Fulfilling legal requirements, including but not limited to the Medical Device Regulation

2.1.4 The legal bases for processing are as follows:

- Consent (Article 6 (1)(a) GDPR) - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- Performance of a contract and prior requests (Article 6 (1)(b) GDPR) - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Compliance with a legal obligation (Article 6 (1)(c) GDPR) - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Legitimate Interests (Article 6 (1)(f) GDPR) - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

2.2 Additional Information

Please refer to the Erbe [privacy policy](#).

### 3. Disclosure of Personal Data

#### 3.1 Recipients of Personal Data

Your data transmitted to Erbe via the website will be disclosed by Erbe to the following recipients or categories of recipients:

- imc information multimedia communication AG (their privacy policy can be accessed [here](#))
- Those public or non-public entities to which Erbe is required to disclose personal data in order to fulfil a legal obligation.

### 3.2 Disclosure to Subsidiaries

If you have given your consent or if Erbe is otherwise legally authorized to do so, Erbe may, if applicable, pass on your personal data to subsidiaries of Erbe for the purposes described in this data protection information. If in this context your personal data is transferred to a non-European Union country, Erbe will take measures to ensure an appropriate level of data protection by other means, particularly the use of Standard Data Protection Clauses in accordance with Art. 46 (2)(c) GDPR.

### 3.3 Transfers outside the EU/EEA

Your data will not be transferred outside of the European Union/European Economic Area.

## 4. Data Retention

### 4.1 Retention Period

We store data for as long as it is necessary to provide the service you have requested or as long as it has been specified in a corresponding consent.

In addition, the personal data collected are stored – insofar as they are subject to retention – until the end of the statutory retention period for merchants (6, 8 or 10 years after the end of the calendar year in which the contractual relationship was terminated) and then deleted.

This does not apply, as an exception, if we are obliged to store data for a longer period of time due to tax or commercial law storage obligations (according to German Commercial Code or Tax Law).

## 5. Your Rights as a Data Subject

### 5.1 Data Subject Rights

You have the following rights vis-à-vis Erbe with regard to your personal data:

- Pursuant to Art. 15 GDPR, you can request information about your stored personal data;
- Pursuant to Art. 16 GDPR you can demand the correction of incorrect personal data;
- Pursuant to Art. 17 GDPR you can demand the deletion of your data;
- Pursuant to Art. 18 GDPR you can demand the restriction of the processing of your data;
- Pursuant to Art. 20 GDPR, you can demand to receive your provided data in a structured, common and machine-readable format;

insofar as the corresponding legal requirements for the claims are given.

The right to information according to Art. 15 GDPR and the right to deletion according to Art. 17 GDPR are subject to the limitations according to §§ 34 and 35 BDSG (Federal Data Protection Act).

### 5.2 Revocation of Consent

Furthermore, if you granted Erbe consent for processing your personal data, you have the right to revoke your consent at any time in accordance with Art. 7 (3) GDPR.

### 5.3 Contact for GDPR Requests

Please send any GDPR-related requests to:

Erbe Elektromedizin GmbH  
Waldhörnlestrasse 17  
72072 Tübingen

Germany  
Phone: +49 7071/755-0  
E-mail: [datenschutz@erbegroup.com](mailto:datenschutz@erbegroup.com)

#### 5.4 Right to Lodge a Complaint

If you believe that your rights in relation to the personal data concerning you have been violated, you have the right to lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR.

### **6. Right of Revocation**

#### 6.1 Right to Object

You have the right to object at any time to the processing of data concerning you by Erbe and collected under Article 6 (1)(e) or (f) GDPR for reasons arising from your particular situation. This also applies to profiling based on these provisions. Following an objection, Erbe will no longer process the data concerning you, unless Erbe can prove compelling grounds for processing that outweigh your interests, rights and freedoms, or that processing serves to assert, exercise or defend legal claims.

#### 6.2 Direct Marketing

If the data concerning you is processed for the purpose of direct marketing, you have the right to object at any time to the processing of the data. This also applies to profiling, in so far as it is related to such direct marketing. If you object to the processing for direct marketing purposes, the data concerning you will no longer be processed for this purpose.