

# BIOTRONIK International Fellows Program

## Data Privacy Notice

The privacy and protection of your personal information is a crucial concern for BIOTRONIK SE & Co. KG. We would like to inform you what personal details are collected and used within the scope of the BIOTRONIK ("BIOTRONIK") International Fellows Program ("IFP"), as well as what configuration options are available to you.

We process your data in compliance with applicable privacy laws, in particular the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG).

### 1 Person responsible and point of contact for data processing

The data controller in accordance with Article 4 para. 7 GDPR is  
BIOTRONIK SE & Co. KG  
Woermannkehre 1, 12359 Berlin  
datenschutz@biotronik.com

If you have questions regarding the processing of your personal data as part of the IFP, you can contact us at [support.ifp@biotronik.com](mailto:support.ifp@biotronik.com).

If you have general questions about data privacy at BIOTRONIK, you can contact our Data Protection Officer. The Data Protection Officer can be reached at [datenschutz@biotronik.com](mailto:datenschutz@biotronik.com) or via post, with an attention to "der Datenschutzbeauftragte" (English: "Data Protection Officer").

### 2 Your rights

You have the right to:

- Request information about the categories of the processed data, the purposes of this processing, possible recipients and the envisaged period for which the personal data will be stored (Article 15 GDPR)
- To withdraw consent given at any time and with effect for the future (Article 7 para. 3 GDPR)
- To object to data processing which is performed based on a legitimate interest, on grounds relating to your particular situation (Article 21 GDPR)
- To request that inaccurate or incomplete data be rectified or completed (Article 16 GDPR)
- To request that data be erased in certain cases – particularly when such data is no longer needed for the intended purpose or that data is unlawfully processed. You can also withdraw

your consent in accordance with Article 7 para. 3 GDPR or have objected to data processing in accordance with Article 21 GDPR (Article 17 GDPR)

- To request the restriction of data processing under certain conditions, provided deletion is not possible or the deletion obligation is disputable (Article 18 GDPR)
- Data portability – that is, you may receive the data you provided to us in a conventional machine-readable format and, if you wish, transmit that data to third parties (Article 20 GDPR)

In addition, you have the right to file a complaint with the data protection supervisory authorities in accordance with Article 77 GDPR. The supervisory authority responsible for BIOTRONIK is:

Berliner Beauftragte für Datenschutz und Informationsfreiheit  
Friedrichstr. 219, 10969 Berlin, Germany  
Tel.: +49 (0)30 13889-0  
Fax: +49 (0)30 2155050  
E-mail: [mailbox@datenschutz-berlin.de](mailto:mailbox@datenschutz-berlin.de)

## 3 Data processing relating to IFP participation

### 3.1 Registration

When you register for the IFP, we record the personal **data** you provide for us when filling out the registration form, including:

- Name
- Country
- Hospital/Department
- E-mail address
- Phone number
- Date of birth
- ESC ID code
- Professional experience
- Course selected (IFP or EHRA)

The **legal basis** for the processing of this data is to fulfill our contractual obligations in accordance with Article 6 para. 1(b) GDPR, in addition to our legitimate interest as set out in Article 6 para. 1(f) GDPR.

No data will be **passed on** to third parties.

Data will be **deleted** either as soon as it is no longer needed for the above-described purposes within the scope of the legal basis upon which the data was retained (for example, if you no longer wish to take part in the IFP) or when retaining that data is no longer required.

### 3.2 User account/IFP website

Once you have been accepted into the program, a user account will be set up on the IFP website (at [www.biotronik-ifp.com](http://www.biotronik-ifp.com)), using your profile, with the following **data**:

- Name
- Hospital
- Country

You can access your account by entering your e-mail address and the password you set for your account.

To ensure you can use the IFP website to the fullest, you have the option of adding additional **data** to your user account, including the following:

- Photos
- Links to social media
- CV or résumé details
- Status updates and details
- Your comments on and reviews of events

In addition, we will automatically allocate events on your program and calendar to your profile.

The information on your profile will be accessible to all registered IFP website users.

To facilitate your participation in the alumni network, you will continue to have access and your profile will be retained after your completion of the IFP program.

The **legal basis** for processing this data is to fulfill our contractual obligations in accordance with Article 6 para. 1(b) GDPR, together with the consent you have granted in accordance with Article 6 para. 1(a) GDPR.

No data will be **passed on** to any third parties other than registered users of the IFP program.

Data will be **deleted** either as soon as it is no longer needed for the above-described purposes within the scope of the legal basis upon which it was retained (for example, if you no longer wish to take part in the IFP) or when its retention is no longer required.

### 3.3 Photographs and video recordings during events

On the condition that you have granted permission, single photographs and/or video recordings may be made portraying you while attending IFP and EHRA events for use in IFP brochure publications and presentations on the IFP website. In addition to this, group photographs and/or videos may be taken for similar purposes.

The **legal basis** for the processing of such data is provided by the consent you have granted in accordance with Article 6 para. 1(a) GDPR, and in relation to group images our legitimate interest as set out in Article 6 para. 1(f) GDPR.

No data will be **passed on** to any third parties other than registered IFP users, with the exception of the service providers (contracted processors) tasked with processing photographs or preparing brochures.

Data will be **deleted** either as soon as it is no longer needed for the above-mentioned purposes within the scope of the legal basis upon which it was retained or when its retention is no longer required.

### 3.4 Browser data

When visiting the IFP website, we automatically collect related data transmitted from your browser to our server. Data are also collected if you simply visit the home page, without logging on to your user account. Depending on the browser and its settings, this can include the following **data**:

- IP address
- Date and time of the inquiry
- Information about the time zone your browser uses
- Address of the requested page (URL)
- The amount of transmitted data
- Operating system
- Name, language and version of the browser software
- Manufacturer and type of device on which the browser was used

We use this data for the following **purposes**:

- Enable you to access and visit the IFP website
- Detect, eliminate, and prevent errors, malfunctions, and possible misuse
- Needs-oriented operation of the IFP website

The **legal basis** for the processing of this data is our legitimate interest in accordance with Article 6 para. 1(f) GDPR.

This data will only be **passed on** to our hosting service providers (contracted processors) within Germany.

Data will be deleted once it is no longer needed for the above-mentioned purposes, within the scope of the legal basis upon which it was retained.

### 3.5 Session cookies

We use cookies on the IFP website. Cookies are small text files or comparable storage technologies which your browser stores on your terminal device, allowing your browser to be recognized.

After you visit the IFP website, your browser stores **session cookies** on your terminal device. These cookies are needed for actions such as logging into your user account and are valid until the end of the browser session. This means that, depending on your browser's type and settings, the cookies are automatically removed after the end of the session or after you exit the tab or browser. The session cookies we use contain only a transaction ID.

You can prevent the use of cookies by configuring your browser accordingly. However, you will then be unable to log into your user account on the IFP website.

## 3.6 Matomo analysis

After you log into your IFP website user account, data regarding how you use the site is collected and statistically evaluated. We use the software “Matomo” for this purpose. A small part of this software is downloaded by your browser from the IFP website. The other part of the software is operated on our server.

The following **data** is transmitted by the Matomo software from your browser to our server:

- Domain name of your Internet service provider
- Title of the requested page
- Address of the previously requested page (referrer URL)
- Screen resolution
- Plug-ins activated in your browser
- The device type used
- Files which were clicked on to download
- Clicked links to external pages

The following information is derived from the data collected:

- Approximate geographic position of the browser, based on the shortened IP address
- Frequency of page views
- Duration of the page visit by the browser

Immediately after receipt and prior to further processing, the Matomo software anonymizes the IP address by shortening it. This ensures that we cannot connect the data with you as a user.

To enable the above-mentioned data to be transmitted and derived, the Matomo software places **persistent cookies** on your terminal device via your browser once you have logged into your IFP user account. These cookies allow, among other things, the unambiguous recognition of your browser and are automatically deleted by your browser approximately one year after the last visit to the website. You can, as a general rule, also manually delete cookies or prevent cookie storage by setting your browser accordingly. As a result, we will not recognize your browser when you revisit the IFP website.

We use this data to allow us to design the IFP website according to user needs.

The **legal basis** for processing this usage behavior data is our legitimate interest in accordance with Article 6 para. 1(f) GDPR.

If you do not agree with this processing, you have the option to configure your browser with a “Do Not Track” option. As a result, the above-mentioned data will not be collected and no cookies will be stored on your terminal device.

No data will be **passed on** to third parties.

Data will be **deleted** once it is no longer needed for the above-mentioned purposes within the scope of the legal basis upon which it was retained.

## 4 Place of data processing

Your data will, in general, be processed in Germany. If, by way of exception, your data is processed outside of the European Union (so-called third countries), you will need to give your express consent for this, it will have been deemed necessary for us to provide services to you, or this is provided for by law (Article 49 GDPR). Moreover, data is processed in third countries only to the extent certain measures can ensure that an appropriate level of data protection exists (Article 44 ff GDPR).

## 5 Data Transmission Encryption

To ensure the confidentiality of your data also during transmission, we use state-of-the-art encryption methods, such as HTTPS/TLS.

Last update: October 30, 2019