



# Privacy policy for IT-supported audio- /video conferences

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ID: 5150

## 1. Subject of the processing

The subject of this declaration is the processing of personal data when conducting preparatory project meetings, customer meetings, assessments and audits - so-called remote and partial remote audits, job interviews and other events via IT-supported audio/video conferencing solutions.

Responsible for the processing:

mdc medical device certification GmbH

Kriegerstraße 6

70191 Stuttgart / Germany

Represented by Mr. Harald Rentschler (CEO)

Designated data protection officer and contact person for customers and employees at mdc:

Wolfgang Heuchert, Contact: [datenschutz@mdc-ce.de](mailto:datenschutz@mdc-ce.de)

## 2. Purpose of processing

The purpose of the processing of the personal data mentioned under point 4. is the performance of preparatory project meetings, appraisals and audits - so-called remote audits (thus the provision of appraisal services), job interviews, online events via the IT-supported audio/video conferencing solutions used by mdc, which are mentioned under point 5. In the case of audits conducted via an IT-supported video conferencing system, all necessary components of an audit, such as the opening meeting, the interviews, the inspection of documents and the closing meeting are conducted via this video conferencing software.

## 3. Legal basis

The legal basis for the processing of personal data in audio/video conferences is the GDPR Art. 6 para. 1 lit. b) the fulfillment of a contract or for the implementation of pre-contractual measures in association with the obligations to cooperate in accordance with the General Terms and Conditions of mdc.

## 4. Types of data and group of persons concerned in the processing of personal data in the context of the use of IT-supported audio/video conferencing systems

Data subjects are all persons participating in an audio/video conference including the organizer, as well as the users and participants whose personal data are processed in the context of the remote audit. Data are collected and processed as follows:

TeamViewer Meeting	
Participants	IP-Address, Name, First Name E-Mail Address
	Download and Installation of a Client-Software
Organizer	Opening of a user account with name, e-mail address and IP address, metadata such as the device identification for the basic functionality
mdc-meet	
Participants	IP-Address and Name (Name is optional)
	No Client-Software necessary, browser based application
Organizer	Name and E-Mail-address
	Online-Meeting can be opened only by employees of mdc

## GoToWebinar

Participants	IP-Address, Name, First Name, E-Mail Address
Organizer	IP-Address, Name, First Name, E-Mail Address, phone number (business only), company address

Furthermore, personal data may be obtained and processed in the course of remote audits, which are necessary for the implementation of the certification procedures. This may concern:

- Name, first name of the contact person

- Job or function title

- Signature of contact person

- Business contact data (address, telephone number, e-mail address)

Further collection of personal data depends on the individual procedures. The processing is carried out on the same legal basis and serves the same processing purpose.

## 5. Software used by mdc

TeamViewer Meeting by TeamViewer AG

mdc uses the software TeamViewer Meeting for remote audits. TeamViewer Meeting is a product of TeamViewer AG, headquartered in Göppingen, Germany. Order processing is part of the manufacturer's EULA license agreement. Comprehensive technical and organizational protection measures have been implemented by the manufacturer to ensure the security of data and connections. For more information about how TeamViewer Meeting processes your personal data, please visit the following Internet link: <https://www.TeamViewerMeeting.com/en/privacy-policy-product/>. mdc uses the TeamViewer Meeting software from the German provider TeamViewer AG, as it is not necessary for our customers to create a user account. Thus, the data sovereignty remains with the contracting parties of the certification agreement. In addition, data transmission is end-to-end encrypted and audio and video data is not stored.

mdc-meet

As an alternative system, mdc offers the use of mdc-meet for customer meetings and remote audits via video conferencing. mdc-meet was created on the basis of the open-source software Jitsi and adapted to the needs of mdc. mdc-meet is operated on mdc's own systems. Therefore no data is passed on to third parties. Comprehensive technical and organizational protection measures have been implemented to ensure the best possible protection of data and information. To participate in a video conference, neither a user account has to be created nor additional software has to be installed. The function is guaranteed regardless of the operating system used on the customer side via a commercially available Internet browser based on e.g. Chromium (e.g. Chrome, Brave, Edge) or also Opera or Safari. The data transmission is SSL-encrypted. No data is stored on our systems. The provision of the name and e-mail address is voluntary and only serves to identify the participants during the video conferences. A recording and storage of the audio or video data does not take place.

GoToWebinar:

The GoToWebinar application from the US provider LogMeIn is used for internal and external online events and training. This software offers a professional platform for the implementation of online events and provides a very high level of security. The privacy policy of the provider LogMeIn and further information on technical and

organizational measures can be found under the following link:

<https://www.logmein.com/de/legal/privacy#>

#### **6. Rights of the data subjects**

According to the requirements of GDPR, you are entitled to exercise the following data subject rights against mdc:

- The right to be informed about personal data processed.
- The right to rectification of the personal data processed
- The right to the deletion of the processed personal data
- The right to the restriction of the processing of the processed personal data
- The right to data portability
- The right to objection to the processing of your personal data

To claim any of the above mentioned rights, please contact our data protection officer at the e-mail address [datenschutz@mdc-ce.de](mailto:datenschutz@mdc-ce.de).

To exercise your data subject rights when voluntarily creating a user account in TeamViewer Meeting, please refer to the information on data protection in the corresponding user agreement of TeamViewer AG.

You also have the right to complain to the data protection supervisory authority responsible for mdc about the processing of your personal data by us if you are of the opinion that this is not carried out lawfully. You can find the responsible supervisory authority in the following table under point 9.

**Overview of privacy information on the processing of personal data in the context of customer meetings, webinars, and remote audits via video conferencing software**

1. Responsible for the processing of personal data	mdc medical device certification GmbH Kriegerstraße 6 70191 Stuttgart Represented by Mr. Harald Rentschler (CEO)		
2. Data privacy officer	Wolfgang Heuchert, <a href="mailto:datenschutz@mdc-ce.de">datenschutz@mdc-ce.de</a>		
3. Purpose of processing	Conducting preparatory client meetings, webinars, events, and assessments as part of certification processes via audio/video conferencing		
4. Legal basis for the processing of data	GDPR Art. 6, 1 lit. b) the fulfillment of a contract and/or the performance of pre-contractual measures		
5. recipients / categories of recipients of personal data	mdc-meet	TeamViewer Meeting by TeamViewer	GoToWebinar by LogMeIn
	<ul style="list-style-type: none"> <li>IT-Administrators of mdc (IP-Address)</li> <li>Participants of the online event (meeting, webinar or audit): Name (optional)</li> <li>Authorizing body: Name</li> <li>Other persons involved in the project at mdc (customer service, project management, experts and decision-makers): name and e-mail address</li> </ul>	<ul style="list-style-type: none"> <li>TeamViewer AG as provider of the Software TeamViewer Meeting: IP-Address, Device identification and, if applicable, name and e-mail address</li> <li>Authorizing body: Name</li> <li>Other persons involved in the project at mdc (customer service, project management, experts and decision-makers): name and e-mail address</li> </ul>	<ul style="list-style-type: none"> <li>LogMeIn as provider of the Software GoToWebinar; IP-Address, Device identification, Name, First name and E-Mail-Address.</li> </ul>
6. Transfer to a third country	mdc-meet and TeamViewer Meeting > No data transfer GoToWebinar > Transfer of data inside the EU (Ireland) and USA possible; Access by the US based headquarters possible		
7. Duration of the storage of personal data	Procedure-relevant data and documents 10 years or until 20 years after expiry of the validity of the certificate. Technically relevant personal data such as IP address and device identifier of the respective videoconferences: 6 months at maximum.		
8. Rights of data subjects	As a data subject, you have the following rights according to the GDPR: <ul style="list-style-type: none"> <li>Information (Art. 15)</li> <li>Correction (Art. 16)</li> <li>Deletion (Art. 17)</li> <li>Restriction of processing (Art. 18)</li> <li>Objection to processing (Art. 21)</li> <li>Data portability (Art. 20)</li> </ul>		
9. Competent data protection supervising authority	The State Commissioner for Data Protection and Freedom of Information House address: Lautenschlagerstr. 20 70173 Stuttgart / Germany E-Mail: <a href="mailto:poststelle@fdi.bwl.de">poststelle@fdi.bwl.de</a> (public key) Internet: <a href="https://www.baden-wuerttemberg.datenschutz.de/">https://www.baden-wuerttemberg.datenschutz.de/</a>		
10. Requirement for the provision of personal data	Section 4 of the General Terms and Conditions of mdc		