

1. Application

- 1.1 This guideline describes the principles on the use and handling of personal data in the light of applicable data protection law and provides a framework for RAUMEDIC's data protection policy.
- 1.2 Its principles apply throughout the group, without exception. Any local statutory regulations that may restrict it always have precedence.

2. Data Protection

2.1 *What is data protection?*

We understand data protection as meaning:

- Protection of the individual against the risks from detrimental consequences of data processing.
- Responsible use and handling of personal data* in accordance with the principles of data protection, such as
 - o Lawfulness and transparency
 - o Purpose limitation
 - o Data minimization
 - o Correctness
 - o Integrity and confidentiality and
 - o Verifiability

* Personal data denotes any information concerning an identified or identifiable natural person. That includes names, dates of birth, addresses, personal characteristics, etc. Identification of a person from the data can be avoided by means of pseudonymization (e.g. replacement of his/her name with a number (pseudonym), thus ruling out any possibility of directly tracing the person) or by means of anonymization.

2.2 *Whom does data protection affect?*

We constantly deal with personal data in our day-to-day work. That means it is the duty of every single employee at RAUMEDIC to handle the data responsibly so as to ensure that the rights of colleagues, customers, suppliers and business partners are protected.

This kind of compliance is also an important concern to us when it comes to transactions with our customers and suppliers. Thus, we expect a high level of data protection from our business partners, as well, to cope with the principles of data protection and data security.

2.3 *Requirements concerning data protection*

The legal bases for data protection at RAUMEDIC are the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG). Our contracts, declarations of consent and our operational organization are adapted to the requirements of the European data protection law and thus ensure a uniform data protection level in dealing with all our customers and business partners. This includes the implementation of technical and organizational measures as part of data security. We also impose these requirements on our customers and supplies to ensure a uniform data protection compliance throughout all business relationships.

The RAUMEDIC AG and all its affiliated companies, that are based outside the EU, have agreed on standard contractual clauses, which guarantee the compliance with the European data protection level when it comes to international data transfer and joint business processes between these companies.

3. Point of contact

For questions relating to data protection, please contact our Data Protection Officer:

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