

GENERAL PRIVACY POLICY OF THE HIRSLANDEN GROUP

1. Scope, objective and purpose of this Privacy Policy

The **Hirslanden Group** (hereinafter also referred to as '**Hirslanden**', '**we**' or '**us**') values your privacy and takes data protection seriously. We would like you to know which data we collect, save and process during our interactions with you. However, this Privacy Policy does not constitute part of any other contracts, such as treatment contracts, partner doctor contracts, supplier contracts or other contracts concluded for the provision of services.

Hirslanden obtains and processes personal data concerning you or other individuals ('**third parties**').

The term '**data**' is used synonymously with '**personal data**' here. 'Personal data' refers to data relating to identified or identifiable individuals, i.e. that enables their identity to be revealed by either using the data itself or corresponding additional information. '**Particularly sensitive personal data**' constitutes a separate category of personal data under special protection by the applicable data protection law. This includes, for example, health data. Item 3 contains information about which data we process as part of this Privacy Policy. '**Process**' refers to any handling of personal data, e.g. its collection, storage, use, modification, disclosure or erasure.

In this Privacy Policy, we describe what we do with your data whenever you are treated in one of our hospitals or outpatient surgery units, purchase or use our services, have a contractual relationship with us, communicate with us or otherwise deal with us. If applicable, we will inform you of additional processing activities not yet mentioned in this Privacy Policy by way of a timely written notification. In addition, we may inform you of the processing of your data separately, for example, in declarations of consent, contractual terms, additional privacy policies, forms and notices.

Whenever you are active on our website www.hirslanden.ch, the specific [Privacy Policy](#) and [Cookie Policy](#) apply.

Separate privacy policies are in place with regards to data processing during the recruitment process as well as in relation to employees, contractors and representatives of the Hirslanden Group; these supplement this General Privacy Policy and take precedence in the event of any discrepancies. A separate privacy policy also exists for beneficiaries of the Hirslanden Pension Fund.

This Privacy Policy is designed to meet the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ('**GDPR**'), of the Swiss Federal Act on Data Protection of 25 September 2020 ('**DSG**') including the Data Protection Ordinance of 31 August 2022 ('**DSV**'), along with the applicable cantonal laws on data protection. Whether and to what extent these regulations apply depends on the individual case.

2. Responsible parties within the meaning of data protection

Under data protection law, the legal entities listed in the Annex are responsible for the data processing activities of the Hirslanden Group described in this Privacy Policy, unless otherwise communicated in individual cases (e.g. in other privacy policies, on forms or in contracts). Up-to-date information on this can be found in the public commercial register (www.zefix.ch) at any time.

The different legal entities have outsourced certain activities to Hirslanden AG. Accordingly, you can contact our Data Protection Officer (see Art. 10(1) DSG) regarding your data protection concerns and the exercise of your rights in accordance with Item 12:

Hirslanden AG
Corporate Office
Data Protection Officer
Boulevard Lilienthal 2
8152 Glattpark (Opfikon)
Switzerland

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Where the Hirslanden Group is subject to the scope of the GDPR, activeMind.legal is our representative in accordance with Art. 27 GDPR. They can be contacted at:

activeMind.legal
 Rechtsanwaltsgesellschaft m. b. H
 Potsdamer Strasse 3
 80802 Munich
 Germany

Queries about this Privacy Policy or concerns relating to data protection should be addressed either to datenschutz@hirslanden.ch or by using our [contact form](#). If you are resident in the EU, you also have the option to contact our EU representative: hirslanden@activemind.legal.

3. Data processed (data categories) and data subjects (categories of persons)

We process different categories of data about data subjects. The most important categories are as follows:

- Identifiable data:
 - Last name, first name, user name, personal identifier, email address, home address, telephone number, date of birth, gender, children
 - Image, video or biometric data (image/photograph (2D/3D)), video recordings, voice recordings, biometric data
 - Origin/nationality (race, ethnicity, nationality, origin (place of birth, ancestors))
- Financial data:
 - Details of debit cards, credit cards, bank accounts, purchases, sales, credits, income, loans, financial transactions, taxes, financial behaviour
 - Possessions, cars, real estate, creditworthiness/solvency/credit rating, insurance, insurance status
- Health data: State of health, healthcare, test results, genetic data, physical attributes (height, weight, etc.), limitations/disabilities, individual and family medical history, medical history, diagnosis, therapies, blood group, medication, vital signs, etc.
- Professional and academic data:
 - Job titles, salary information, CV, data on schools, HR dossier, employment relationship, qualifications (performance/behaviour), references, interviews, certificates, disciplinary measures
 - Communication history, call recordings, email, correspondence
- Data on preferences, social and family life, politics and denomination
 - Views, interests, likes and dislikes (e.g. music, food, etc.), belief, personal convictions, knowledge, life goals, etc.
 - Gender identity (not necessarily identical with gender), sexual views, sexual life
 - Character, reputation, social status, marital status, political affiliations, denomination/religion, family members, social contacts/networks
 - Criminal proceedings, sentences, penalties and measures, pardons
- Computer-related data
 - Passwords, PIN, features for verification (MFA, password recovery)
 - IP addresses, Mac addresses, browser fingerprint, surfing behaviour, call logs, links clicked, settings, geolocation and geo-tracking

We collect data from the following categories of persons:

- Patients
- (Potential) customers, interested parties
- Relatives/visitors
- Employees or other auxiliary personnel including temporary employees, trainees, students
- Partner doctors
- Applicants
- Authorised representatives

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- Subscribers
- Contractors/suppliers
- Agents, etc.
- Others/third parties, e.g. consultants, third-party company employees

4. Collection of your personal data

On the one hand, we obtain the data specified under Item 3 largely from **you** directly; this is obtained when you disclose this to us yourself (e.g. in the context of healthcare provision as well as our other services or further interactions with us). With the exception of individual cases (e.g. legal requirements), you are under no obligation to disclose your data. However, if you, for example, conclude contracts with us or wish to make use of our services, you are required to disclose certain data to us. If you disclose to us data about other individuals (e.g. relatives, other related individuals or other (healthcare) providers, we will assume that you are authorised to do so, that the data is correct and that you have made sure that the data subjects have been informed of this disclosure as far as this is a legal obligation (e.g. by making them aware of this Privacy Policy beforehand).

In addition, we receive part of the above data from **third parties**, such as other healthcare providers, social security or private insurance companies, authorities, (former) employers, relatives, credit agencies or other third parties.

Furthermore, we may obtain data from **publicly accessible sources** such as debt collection registers, land registers, commercial registers, the media, the internet (including social media), etc.

5. Purposes of data processing

Whenever you make use of our services (such as examinations or nursing), purchase products (in particular, medications or medical devices) or otherwise interact with us, we process your data for the following purposes:

- **Healthcare provision:** we process your data in order to competently provide, document and invoice our services in the context of healthcare provision. This includes all aspects of your treatment, including the admission procedure, the treatment itself, the management of your patient records, handling of the case, the encoding of clinical diagnoses and procedures, invoicing, the submission of complaints, general administration and personnel-related processes in the context of your treatment. For this purpose, we process in particular your name, contact details and health data (e.g. details on current and past diagnoses, therapies, prescribed medication, visual recordings such as X-ray, tomography or other imaging, laboratory and other analyses, reports and treatment notes, but also additional information about your health condition incurred as part of your medical history, clarifications, treatment and consultation). Under the scope of healthcare provision, we may also communicate with you via digital channels.
- **Initiation and conclusion of contracts:** with regard to the conclusion of a contract (not only to establish a treatment relationship, but also if you purchase hotel services, other services or products from us or if we purchase products or services from you or your contractor or employer, we may obtain and otherwise process in particular your name, contact details, health data, photos, powers of attorney, declarations of consent, information on third parties (e.g. contacts, information on relatives or other related individuals), contractual contents, date of conclusion, creditworthiness data and all other data that you provide to us or that we collect from public sources or third parties (e.g. references).
- **Administration and processing of contracts:** we obtain and process personal data to enable us to comply with our legal and contractual obligations towards our patients, authorities, insurance companies and other contractual partners (e.g. other healthcare providers, referring providers, suppliers, service providers, project partners) and in particular, fulfil and claim contractual services. This also includes data processing to support our other customers, who are not patients, and the enforcement of contracts (invoicing of services to insurance companies, collection, court proceedings, etc.), accounting and public communications. For this purpose, we process in particular the data that we obtain or have obtained as part of the initiation, conclusion and processing of the contract, as well as, for example, data relating to contractual services and service provision, information on reactions, and financial and payment information.

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- **Communications:** in order to communicate with you and with third parties via email, telephone, fax, digital communication channels, by post or otherwise (e.g. to respond to queries, as part of a treatment or consultation, and for contract initiation or processing), we process in particular the contents of the communications, your contact details and the marginal data of the communications. This also includes image and audio recordings of (video) calls. If we have to or wish to identify you, we will collect additional data (e.g. a copy of your passport, your ID or another official identification document).
- **Research:** we may also process your personal data for research purposes under compliance with the legal requirements (e.g. Swiss Federal Human Research Act, etc.). For this purpose, we may process in particular your health data, but also your genetic data. Wherever compatible with the research purpose or legally required, we will process the data such that it is no longer possible to identify you personally, or is only possible at a disproportionately high effort. If anonymisation is not possible, we will pseudonymise your data. The research results will be published exclusively in anonymised form.
- **Relationship management, information and marketing purposes:** we also process your personal data for relationship management and marketing purposes, for example, in order to send our customers, other contractual partners and other individuals personalised advertising (e.g. on our website, as printed material, by email or via other channels) on products, services and other news (e.g. about events, competitions, general information, press releases or marketing campaigns) from us and from third parties (e.g. from product partners). To do so, we process in particular names, email addresses, telephone numbers and other contact details (e.g. political information for politicians or specialisations for specialists) that we obtain from public sources, when concluding or processing a contract, or during any registration (e.g. for the newsletter). You can reject this material at any time or revoke your consent to be contacted for marketing purposes in the respective newsletter, on the other registration page or by sending an email to datenschutz@hirslanden.ch.
- **Improvement of our services, operations and product development:** we collect data about your behaviour and preferences in order to continually improve our products, services and processes. If necessary, we may supplement this information with details from third parties (including from publicly accessible sources). We may also use your data to develop solutions using artificial intelligence/AI (for training AI models), which are in turn aimed at improving our services and operations (e.g. chatbot development, automation of encryption, automation of medical reports, predictions about no-shows, etc.). Furthermore, Hirslanden will contact you and invite you to take part in surveys conducted for quality assurance purposes.
- **Registration:** you need to register (directly with us or via our external login provider) in order to use certain offers and services (e.g. login areas, WiFi, newsletter, apps). For this purpose, we process the data disclosed during the respective registration procedure. Furthermore, we may also collect personal data about you when you use the offer or service. Where necessary, we will provide you with additional information on the processing of this data.
- **Security processes and access controls:** we obtain and process personal data in order to ensure the appropriate security of our IT and other infrastructure (e.g. building) and improve this on an ongoing basis. This includes surveillance and monitoring of electronic admissions to our IT systems, as well as of physical access points to our premises, analyses and tests of our IT infrastructures, system and error checks, and the creation of security back-ups. For documentation and security purposes (for prevention purposes and to clarify incidents), we also keep access logs or visitor lists relating to our premises and use surveillance systems (e.g. security cameras, see Item 11). We use corresponding signage to make you aware of the surveillance systems at the locations concerned.
- **Compliance with laws, directives and recommendations from authorities and internal regulations ('compliance'):** We obtain and process personal data in order to comply with the applicable laws (e.g. healthcare regulations, child and adult protection duties, social security and tax law obligations, professional duties in healthcare), in-house regulations, certifications, internal and external audits, industry standards, our corporate governance, as well as for internal and external investigations to prevent and clarify crimes and other misconduct (e.g. by a prosecution or supervisory authority or a contracted private body).

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- **Risk management and company management:** we obtain and process personal data in the context of risk management (e.g. to protect against criminal activities) and company management. This includes, among other things, our business organisation (e.g. resource planning) and corporate development (e.g. acquisition and sale of business divisions, companies or parts of companies and other corporate law transactions, and in relation to this, the transmission of personal data, along with measures for business management and compliance with legal and regulatory obligations as well as internal provisions at Hirslanden).
- **Other purposes:** other purposes include training and education purposes, administrative purposes (e.g. accounting) or the organisation of events (e.g. professional events for healthcare or other specialists, patients and other customers, as well as for the public). We may use your data, including in particular your health data, for training and further education purposes in anonymised form in order to protect and ensure the safety of you or other patients, employees, third parties or the general public, as well as for quality assurance. In addition, we may process personal data for the organisation and performance of events, and any post-event activities, such as and in particular attendance lists, presentation and discussion content, as well as photos and audio recordings made during these events. The preservation of other legitimate interests also falls under these other purposes; the list provided is not exhaustive.

6. Changes to the purposes of data processing

We use your personal data exclusively for the purposes for which it has been obtained and processed, or if this is reasonably compatible with the original purpose of use. If we have to use your personal data for another purpose, we will inform you accordingly, providing an explanation of the legal grounds authorising us to do so.

We may process your personal data lawfully without your knowledge or consent if this is required or permitted by the applicable law.

7. Forwarding of data to third parties

In connection with the purposes listed above, we may transmit your personal data in particular to the following categories of recipients:

- **Other healthcare providers:** we work with other healthcare providers (e.g. referral or aftercare providers, in particular, family doctors, medical practices, other clinics and hospitals, rehabilitation facilities, etc.) in particular for the prior care or aftercare of patients. In other cases and particularly during the care relationship, we also rely on cooperation with other providers (e.g. laboratories, medication and medical device manufacturers, ambulance and rescue services, partner doctors, etc.). These healthcare providers may process data that they have received from us or collected for us on our behalf, under shared responsibility with us or under their own responsibility.
- **Service providers:** we work with other service providers domestically and abroad, who may process data that they have received from us or collected for us on our behalf, under shared responsibility with us or under their own responsibility. These service providers include IT providers, IT service providers, advertising service providers, banks, insurance companies, debt collection agencies, address verification companies, consulting agencies, temporary recruitment agencies, auditing companies and solicitors. We usually conclude contracts with these third parties on the use and protection of personal data. By doing so, we contractually ensure that the service providers and their subcontractors will guarantee an appropriate level of protection for your personal data, corresponding to at least our own level of protection, at all times.
- **Patients, customers and other contractual partners:** these primarily refer to patients, customers and other contractual partners of ours to whom your data is contractually required to be transmitted (e.g. because you work for a contractual partner or they provide services for you). This category of recipients also includes contractual partners with whom we cooperate or who carry out advertising for us. The recipients generally process the data under their own responsibility.
- **Authorities and courts:** we may forward personal data to public offices, courts and other authorities (including social security companies) domestically and abroad if we are legally obliged or

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authorised to do so and this appears necessary for the preservation of our interests. These recipients process the data under their own responsibility. Furthermore, we reserve the right to store and process personal data we collect in order to comply with tax-, accounting-, health-related and other provisions, as well as special laws concerning the retention of documents.

- **Business transactions:** as part of corporate development, we may sell or acquire business divisions, companies or parts of companies and assets, or enter into partnerships, which may result in the disclosure of data (including from you, e.g. as a patient, customer or supply or representative thereof) to the individuals involved in these transactions due to its qualification as part of the transferred assets, which could involve you in the provision of a service. If we forward your data for this purpose, this will be restricted to the required minimum, and we will obligate these third parties to protect your personal data by taking appropriate security measures and at least at the same level as we do.
- **Other individuals:** these refer to other cases resulting in the involvement of third parties for the above purposes. These concern, for example, delivery addresses or payment recipients specified by you, pastoral care, third parties under representative relationships (e.g. your solicitor or bank, as well as advisors or relatives authorised to represent you or other third parties) or individuals involved in official or court proceedings. Communication with our competitors, industry organisations, associations and other boards may also involve the exchange of data relating to you.

All these categories of recipients may involve third parties to you, meaning that your data may also become accessible to them. We may restrict processing by certain third parties (e.g. IT providers), but not by other third parties (e.g. authorities, banks, etc.).

We also allow certain third parties to you to collect your personal data under their own responsibility (e.g. media photographers at events, providers of tools incorporated into our website, etc.). To the extent that we are not decisively involved in this data collection, it is the sole responsibility of these third parties.

8. Data transmission abroad

We mainly process and store personal data in Switzerland and in states whose legislation guarantees appropriate protection (see list in Annex 1 DSV), but in exceptional cases, potentially in any country in the world.

If a recipient is located in a country without appropriate data protection, we will contractually obligate them to maintain a sufficient level of data protection (we will use the standard contractual clauses of the European Commission, including the supplements necessary for Switzerland, for this purpose), unless they are already subject to a legally recognised policy to ensure data protection and we cannot depend on an exemption clause. An exception may apply in legal proceedings abroad, but also in cases of overriding public interests, if the processing of a contract in your interest requires such disclosure, if you have consented to it or the collection of your consent is not possible within a suitable deadline, but the disclosure is necessary to protect your life or physical integrity or those of a third party, or if you have not objected to the processing of data made publicly accessible by you.

9. Data security

Your personal data is treated confidentially at all times and recorded, processed and stored by Hirslanden and our service providers in such a way that appropriate data protection is guaranteed. This also includes the protection of your personal data against unauthorised or unlawful data processing or against unintentional loss, destruction or damage using suitable technical and organisational measures. These also include the following:

- Identity and access management;
- Infrastructure and company protection;
- Vulnerability management;
- Business continuity planning;
- Disaster recovery planning and
- Security awareness.

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Other individual features of the appropriate technical and organisational measures we apply are available on request.

We have procedures in place for the handling of all potential breaches of data security and will inform you and the responsible supervisory authorities of breaches where we have a legal obligation to do so.

10. Retention of data

We would like to point out that we generally only process your data for as long as required by our processing purposes, statutory or contractual retention periods and our legitimate interests, in particular for documentation and evidence purposes, or if the storage is required from a technical standpoint (e.g. in the case of back-ups or documentation management systems). If not prevented by any legal or contractual obligations or technical reasons, we will erase, destroy or anonymise your data generally after expiry of the storage or processing period as part of our usual processes and in compliance with our internal retention policy.

11. Video surveillance

11.1 Purposes of data processing and legal grounds

The surveillance cameras are used to process all personal data that is generated when someone is located in the respective recording range. These include in particular physical movements, behaviour, all visible areas of the body, etc.

Video surveillance on the Hirslanden premises (partly public areas, partly non-public areas) is intended for the following purposes:

- To prevent and clarify criminal acts and other misconduct (e.g. of violent crimes or aggressive behaviour, conduct internal investigations, perform data analyses for tackling fraud);
- To guarantee safety for patients, employees and other third persons;
- To enforce legal claims and defend ourselves in relation to legal disputes and official proceedings;
- To guarantee our operations.

11.2 Duration of storage

Video recordings from publicly accessible surveillance cameras are generally stored for up to 30 days. Video surveillance by non-publicly accessible surveillance cameras usually only takes place in real time. Storage for longer periods only takes place in accordance with statutory retention and documentation obligations. In this case, personal data may be stored for the period in which claims can be enforced against Hirslanden and if we are otherwise legally obliged to this or legitimate interests require it (e.g. evidence or documentation purposes).

11.3 Data recipients and data transmission abroad

Recipients of video recordings are first and foremost selected employees of Hirslanden who require them in order to fulfil the processing purpose. We only forward your personal data to third parties to make use of technical or organisational services that we require to fulfil the specified purposes or our other business activity. In the case of support by an external company, the surveillance cameras or video recordings may temporarily be accessed from other countries anywhere in the world. If data is transmitted to a country without an appropriate level of data protection, we will use corresponding contracts (standard contractual clauses) or binding corporate rules to ensure an appropriate level of data protection or depend upon the legal exceptions for consent, contract processing, identification, exercise or enforcement of legal claims or overriding public interests.

If required, the recordings will be handed over to domestic and/or foreign authorities for criminal, civil or administrative proceedings.

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12. Your rights as a data subject

You have certain rights in relation to our data processing. In compliance with applicable law, you can in particular request information about the processing of your personal data, have incorrect personal data corrected, request the erasure or restriction of certain personal data, file an objection to data processing, request the publication of certain personal data in a standard electronic format or request its transmission to other data controllers.

Where cantonal provisions apply to the handling of information and data protection, you can, depending on the cantonal law, enforce additional rights in some cases, such as the blocking of your personal data.

If you wish to exercise your rights towards us, please contact us (see Item 2 above). To enable us to rule out misuse, we need to identify you beforehand (e.g. with a copy of your identification document if necessary). The exercise of your rights is free of charge. An appropriate sum may be charged to you only where disproportionately high effort is required.

Please note that requirements, exceptions or restrictions apply for these rights (e.g. for the fulfilment of statutory retention obligations, the protection of third parties or professional and trade secrets). We reserve the right to redact copies on the grounds of data protection law or secrecy, or to only provide excerpts from these.

You also have the right to enforce your claims in court or to file a complaint with the responsible data protection authority.

13. Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time. The version published on this website is the version currently in force.

Updated December 2024

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Annex: list of all legal entities of Hirslanden AG

Mittelland region

Hirslanden Bern AG

- Salem-Spital
- Klinik Beau-Site
- Klinik Permanence

Hirslanden Freiburg AG, Düdingen

- Praxiszentrum Düdingen outpatient clinic

Hirslanden Klinik Linde AG

- Klinik Linde

Hirslanden OPERA Bern AG

- Opera Bern

Medical Center Wankdorf AG

- Medical Center Wankdorf

Klinik Birshof AG

- Klinik Birshof

North-Eastern region

Hirslanden AG

- Klinik Hirslanden
- Klinik Im Park
- Hirslanden Corporate Office
- Zenlop

Pensionskasse Hirslanden

- Hirslanden Pension Fund Foundation

Hirslanden OPERA Zumikon AG

- Opera Zumikon

Hirslanden Precise AG

- Hirslanden Precise Zollikon

Hirslanden OPERA AG

- Opera Holding

Radiotherapie Hirslanden AG

- Institute for Radiotherapy Zurich

Quality of Life Foundation Switzerland

- Quality of Life Foundation

Hirslanden Klinik Am Rosenberg AG

- Klinik Am Rosenberg

Klinik Stephanshorn AG

- Klinik Stephanshorn

Radiologie Neudorf AG

- Radiologie Neudorf

Hirslanden OPERA St. Gallen AG

- Opera St. Gallen

Hirslanden Klinik Aarau AG

- Hirslanden Klinik Aarau

Radiotherapie Hirslanden AG

- Radiotherapie Hirslanden

Central region

AndreasKlinik AG Cham

- AndreasKlinik Cham Zug

Klinik St. Anna AG

- Klinik St. Anna
- St. Anna in Meggen
- St. Anna im Bahnhof

Ouroboros Solutions AG

- Ouroboros Solutions

Lémanique region

Clinique des Grangettes SA

- Clinique des Grangettes

Hirslanden Clinique La Colline SA

- Clinique La Colline

Hirslanden Lausanne SA

- Institut de radiologie de l'Ouest lausannois
- Clinique Bois-Cerf
- Clinique Cecil