

## DATA PROTECTION POLICY for TeleDoc services

As of November 26, 2019

TeleDoc protects your privacy. This privacy policy is intended to inform you about how we process personal data when you use our TeleDoc Consultation. "Personal data" means information relating to an identified or identifiable natural person.

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## Categories of personal data processed by TeleDoc

Personal data that is collected when registering a TeleDoc ID and taking advantage of a medical consultation.

The TeleDoc electronic health record (ELGA) is created for you for documentation (only after consulting a doctor), for online storage and for access to personal health information.

This includes:

■ TeleDoc ID (CIC) electronic health record (ELGA):

■ First name ■ Current state of health

■ Last name ■ Symptoms

■ Name of the father ■ Complaints

Street, number, allergies

■ ZIP code, city ■ Medicines

■ date of birth ■ medical history

■ email address

■ Mobile number

and that your doctor records the results of the consultations in accordance with his obligations under applicable law. Your doctor will attach the information provided or collected during the consultation to the EMR (which we can supplement with documents that will be reviewed during the consultation, although the doctor cannot directly save or add images or documents). You can distribute the images to the doctor using the chat function during the consultation, but these images are not automatically saved in your documents on the platform. If you want to add a specific detail to the EMR, it is your responsibility to notify the doctor of this request during the consultation. By using the platform, you agree that TeleDoc and doctors have the right to use EMR for the purpose of providing services. This use is always in accordance with the applicable laws and our privacy policy (<https://www.TeleDoc.xx/legal/privacy-policy>).

Recording of the consultations.

We have no right to record consultations in any form.

#### PURPOSES AND LEGAL BASIS

(a) TeleDoc processes the first name, last name, mobile number and TeleDoc ID for authentication purposes. The legal basis for processing first names, last names, cell phone numbers and the TeleDoc ID for this purpose is based on the legitimate interest of TeleDoc to protect access to our services.

(b) In order to use our TeleDoc app on smartphones and tablets, the email address and the password generated by TeleDoc are required.

The legal basis for processing the password and email address for this purpose is TeleDoc's legitimate interest in ensuring the security of your TeleDoc APP.

You can find further information on how we use personal data in our data protection regulations (<https://www.teladoc.xx/legal/privacy-policy>).

Categories of recipients of personal data

#### ISSUING BANKS AND PAYMENT NETWORKS

To provide the service, TeleDoc shares information with issuing banks and payment networks when necessary to detect fraud, obtain a payment token that represents the credit card, and display information about the transaction.

#### SERVICE PROVIDER

TeleDoc uses the Hermes Cloud for hosting and providing the TeleDoc service for our doctors. TeleDoc also uses PayPal as a payment provider.

TeleDoc uses external service providers to gain a better understanding of the use of the TeleDoc app by the user.

#### FURTHER DISCLOSURE OF INFORMATION

We may disclose your personal information to others: (a) if we have your effective consent; (b) to comply with a valid subpoena, legal system, court order, legal process or other legal obligation; (c) to enforce our terms or policies; or (d) to enforce available remedies or to defend legal claims as needed.

We may also process your personal information in the event of restructuring, merger, sale, joint venture, transfer, transfer or other disposal of TeleDoc's business, business assets or shares, whether in whole or in part, and the like. a. in connection with bankruptcy or similar procedures, to affiliated companies, subsidiaries or third parties, provided that such a party to whom we transfer personal data is not permitted to process your personal data in any other way than that specified in this data protection guideline without informing you of this and, if required by applicable laws, obtain your consent.

#### Transfer of personal data

TeleDoc is a global company. So that we can offer and update our products, apps and services, It may be necessary to transfer your personal data to other TeleDoc companies in other countries. [Show TeleDoc companies](#). If you create a TeleDoc account, add personal data to your account profile or upload data to your TeleDoc account, your personal data will be recorded and stored on the servers of TeleDoc Europe AG in Germany. Personal data about persons who are located in a country of the European Economic Area ("EEA"), in the United Kingdom ("UK") or in Switzerland are under the control of TeleDoc Europe AG and are processed on their behalf by TeleDoc Global.

All TeleDoc companies must follow the data protection practices outlined in this privacy policy.

#### Cookies and similar technologies

We collect data from users regarding their use of the TeleDoc service. We collect analytical data, e.g. For example, the date and time a user accesses the service, device information, language settings, user behavior (e.g. which functions are used and how often), information about the device status, device model, hardware and operating system, and information about how the service. TeleDoc uses this data to optimize the quality and functioning of the service, to develop and market products and functions that are most useful to you and other users, and to problems with the stability of the service and other problems with the Identify and fix usage as soon as possible.

The legal basis for the processing of this analytical data is our legitimate interest in understanding how our customers interact with the TeleDoc service so that we can optimize the user experience and the functions of the service.

Here are some third-party analytics and related services that we are currently working with:

#### ANALYTICS SERVICES

- Google: Google Analytics is used to collect statistics and demographic data and interests of users and user behavior regarding the TeleDoc service. Further information on the possible use of this analytical data, on controlling the use of your information and on refusing Google Analytics to consent to the use of the data.

## Updates to the privacy policy

We may update this data protection declaration from time to time when we add new products and apps, optimize our current offering or when technologies and laws change. The date of the last revision of this privacy policy can be found in the "Last updated" legend at the top of the page. Changes take effect with the publication of the revised data protection guideline.

If there are significant changes, you will be informed by us and, if required by applicable law, we will obtain your consent. We will inform you by email or by posting a notice of changes to the TeleDoc websites and apps that link to the privacy policy.

## Storage of personal data

We store your personal data for as long as your TeleDoc ID is considered active, or until you or the responsible person request that your account be deleted. Furthermore, you will find a description of your right to have the data deleted under "Your rights" below.

## Responsible person and data protection officer

### IF TELEDOC IS A PROCESSING PARTY

If our TeleDoc APP is used on a smartphone, tablet or other third-party device, TeleDoc serves as the processing party. If you wish to exercise your rights or receive further information, please contact the third party provider of your device.

### IF TELEDOC SERVES AS A RESPONSIBLE PERSON

If our TeleDoc APP is used on a smartphone, tablet or other device from a third-party provider, TeleDoc serves as the responsible person.

The control of personal data is subject to TeleDoc Europe AG at the following address: Langgreut 17, 9322 Egnach, Switzerland. The company's EU data protection officer can be found at the same address and can be reached by email at the following address: [support@TeleDoc-Europe.com](mailto:support@TeleDoc-Europe.com)

## Your rights

If you are based in the European Union or the United Kingdom, you are entitled under the General Data Protection Regulation (GDPR) or the UK Data Protection Act 2018 to request TeleDoc to access and correct or delete your personal data; You also have the right to data portability, the right to restrict the processing of your personal data, the right to object to the processing of your personal data and the right to lodge a complaint with a supervisory authority. More information on these rights can be found on the page

[https://ec.Europe.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights\\_de/](https://ec.Europe.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights_de/)

the European Commission regarding the GDPR, which can be displayed in different languages. If you are based outside the European Union or the United Kingdom, you may have similar rights under local laws.

If you would like to exercise any of your rights as a data subject regarding the TeleDoc service, please contact the company's EU data protection officer:

TeleDoc Europe AG, Langgreut 17, 9322 Egnach, Switzerland. Email: [support@TeleDoc-Europe.com](mailto:support@TeleDoc-Europe.com)