

Privacy Notice for the Patient Experience Feedback (NPS)

The success of Southern Prosthetics & Orthotics depends not only on the global networking of information flows between Southern Prosthetics & Orthotics as a company, its employees, customers and patients, but above all on the trustful, secure handling of personal data.

The Ottobock SE & Co. KGaA, Max-Näder-Straße 15, 37115 Duderstadt, (hereinafter referred to as „Ottobock“ or „we“) operates the website and survey platform “Patient Experience Feedback” available on the Internet at <https://ottobock.fra1.qualtrics.com/>, including the respective sub-directories (hereinafter referred to as the "website") and processes together with the respective participating Ottobock SE & Co. KGaA’s affiliate company the data collected during the survey as joint controller.

With this Privacy Policy, we inform you about which data we process when you visit our website and take part in the survey. Therewith we also fulfil our obligations from the Art. 13 and Art. 14 of the General Data Protection Regulation (GDPR).

I. Controller

The controller for the data processing on the website is the:

Ottobock SE & Co KGaA, Max-Näder-Strasse 15, 37115 Duderstadt, Germany

If you take part in a survey, the data collected will be processed in joint controllership with the competent regional Ottobock SE & Co. KGaA’s affiliate company. The Ottobock SE & Co. KGaA’s regional affiliates are listed at the end of this notice.

II. Data Protection Officer

You may reach the Data Privacy Team of Southern Prosthetics & Orthotics confidentially via Use of the website <https://spao.com.au/en/contact-us>

1. Secure provision of the website

In case you visit our website, the web server temporarily collects the following information to display the website.

2. Processed categories of data:

- Browser
- Version
- Operating System
- Screen Resolution
- Flash Version
- Java Support
- User Agent
- IP Address

- Date
- Time

3. Purposes:

The interest of Southern Prosthetics & Orthotics and its participating affiliate companies is the secure and functional operation of the website and the survey platform. The logged data is used in particular for the purposes of data security, to defend against attempts of attack on our web servers. We reserve the right to carry out statistical evaluation of anonymous data records.

4. Legal basis:

The processing of this data is based on Art. 6 para. 1 f GDPR: We have a legitimate interest in ensuring data security and trouble-free operation.

5. Storage periods or criteria for determination:

The aforementioned categories of data are stored for 6 months.

6. Information on the use of cookies and other technologies

To ensure that the website and platform work we use cookies on the website.

- Cookie name: previewDC
- Domain: qualtrics.com
- Validity: 1 Month
- Cookie name: QSI_HistorySession
- Domain: ottobock.fra1.qualtrics.com
- Validity: Session

III. Taking part in the survey

1. Improving patient experience

During the survey, data will be collected for the purposes of evaluating and improving patient experience throughout Southern Prosthetics & Orthotics care.

On our website you can take part in the Patient Experience Feedback survey. You may complete the survey directly on site in the clinic on a tablet provided to you or later by using your own device. For taking the survey at a later time, you will have the option to receive an email or text including a link to the website.

The survey consists of several questions regarding your patient experience. We will calculate a so called net promoter score from the collected information and analyze the score and the information for gaining insights in patient satisfaction and enables us to improve patient experience throughout Southern Prosthetics & Orthotics care.

After the survey is completed, you are asked, if a member of the Southern Prosthetics & Orthotics team may contact you to discuss your feedback. If you choose yes, we will ask for your name

and telephone number and call you afterwards. Your answers during the phone call will also be processed for the purposes of evaluating and improving patient experience.

If you choose not to be contacted, your answers will be processed anonymously. We will not be able to identify you or link the answers to you in any way. If you choose to give your name, however, your answers will be linked and processed in connection with your name and phone number.

For conducting the survey, we use the services of Qualtrics Ireland Ltd., Costello Hous, 1 Clarendon Row, Dublin 2 D02 TA43, Ireland. Qualtrics Ireland Ltd and its sub processors. These sub processors are also located in third countries outside the EU. Insofar as a third country transfer takes place and no adequacy decision of the European Commission exists for the destination country, we or Qualtrics Ireland Ltd. have concluded standard contractual clauses of the European Commission with the recipient in the third country as appropriate guarantees to provide for an adequate level of data protection also for the processing in the third country. Information on suitable safeguards may be obtained from the Global Data Privacy Officer.

2. Processed categories of data:

- Content of survey.
- Answers given in the course of the survey.
- Net Promoter Score.
- Name and phone number (if given voluntarily)
- Email address (only if we should send you the link to the survey)

3. Purposes:

The purpose of the NPS survey is to obtain data about patient satisfaction that we can use to improve our services in accordance with customer agreements, legal requirements and standards that our business is covered by. The data, based on patients' responses, can help us improve our operations and care from the perspective of patient safety, clinical development and quality.

4. Legal basis:

The processing of this data is based on our legitimate interest Art. 6 para. 1 f GDPR, whereas our legitimate interest is to conduct the survey and contact you thereafter.

5. Storage periods or criteria for determination:

The data is stored for 3 years.

6. Information on the use of cookies and other technologies

Please refer to Sec. III.6 above.

7. Joint Control

The Ottobock SE & Co. KGaA and the regionally competent Ottobock affiliate will process the information collected in connection with the survey as joint controller in order by evaluating the answers and the score to improve their products and services.

Ottobock SE & Co. KGaA is responsible for operating the survey platform and for data security during processing. The regionally competent Ottobock affiliate is responsible for informing me about the survey and the opportunity to participate. Both participate in the results of the surveys. I can assert my rights as a data subject against both companies, but Ottobock SE & Co. KGaA is responsible internally.

You may assert your data subject rights in connection with the processing in joint controllership against all responsible parties so that the joint controllership will not lead to any disadvantages for you.

IV. Your rights

You have the right,

- a) to request **confirmation** as to whether we are processing personal data concerning you. If this is the case, you have the right to **access** information about this processing (Art. 15 GDPR).
- b) to demand the **rectification** or completion of inaccurate or incomplete data (Art. 16 GDPR);
- c) in certain cases (Art. 17 GDPR) to request the **erasure of data**;
- d) under certain conditions, to request the **restriction of processing**; (Art. 18 GDPR);
- e) under certain conditions to **data portability**, i.e. you may receive your data, which you have provided us with, in a structured, common and machine-readable format or have it transferred to another controller (Art. 20 GDPR);
- f) to **complain** to a **supervisory authority** (Art. 77 GDPR).

Right to object (Art. 21 GDPR)

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you (Art. 6 I lit. f GDPR). This also applies to profiling based on these provisions. We will then no longer process the personal data, unless we can demonstrate compelling legitimate grounds for processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

V. From whom we receive and to whom we share information

To the competent regional affiliate company – the competent regional affiliate company will have access to the survey data, the net promoter score and the results of the analyses via the Qualtrics platform

To processors – companies that Ottobock commissions with the processing of data within the legally stipulated framework (Art. 28 GDPR - service provider). In this case Ottobock remains responsible for the protection of your data.

Our processors are carefully selected, are bound by our instructions and are regularly checked by us. We only commission processors who offer sufficient guarantees that suitable technical and organizational measures are taken in such a way, that processing is carried out in accordance with the requirements of GDPR and guaranteeing the protection of your rights. We use external service providers insofar as we cannot or cannot reasonably perform services ourselves.

These external service providers are primarily providers of IT services, such as our hosting, e-mail or telecommunications provider.

VI. Obligation to provide data and existence of automated decision-making (including profiling)

You have no contractual or legal obligation to provide us with personal data.

We do not use any automated decision-making, including profiling in accordance with Art. 22 (1) and (4) DSGVO, which would have legal effects on you or affects you similarly.

VII. Participating Ottobock SE & Co. KGaA's affiliate companies

Entity	Link to Privacy Notice
Dorset Orthopedics (UK)	www.corporate.ottobock.com/en/footer/data-privacy-statement/
Southern Prosthetics and Orthotics	www.spao.com.au/en/security/-/compliance
Ottobock Brazil	www.ottobock.com/pt-br/privacy/footer
Ottobock China	www.ottobock.com.cn/footer-page-bottom/data-privacy-statement.html#法律声明
Ottobock Colombia	www.ottobock.com/es-co/aviso-de-privacidad
Ottobock Croatia	www.ottobock.com/hr-hr/pravila-zastite-privatnosti
Ottobock France	www.ottobock-ortho.fr/politique-confidentialite/
Ottobock India	www.ottobock.com/en-in/privacy-policy
Ottobock Ireland	www.corporate.ottobock.com/en/footer/data-privacy-statement/
Ottobock Italy	www.ottobock.com/it-it/privacy/gdpr
Ottobock Kenya	www.corporate.ottobock.com/en/footer/data-privacy-statement/
Ottobock Morocco	www.ottobock-ortho.fr/politique-confidentialite/
Ottobock North America	www.corporate.ottobock.com/en/footer/data-privacy-statement/
Ottobock Philippines	www.corporate.ottobock.com/en/footer/data-privacy-statement/
Ottobock Poland	www.ottobock.com/pl-pl/compliance
Ottobock Romania	www.ottobock.com/ro-ro/declaratia_de_confidentialitate_a_datelor
Ottobock Serbia	www.ottobock.com/sr-rs/izjava-o-privatnosti-podataka
Ottobock Thailand	www.ottobock.com/en-th/privacy-policy
Ottobock Turkey	www.ottobock.com/tr-tr/gizlilik-politikasi
Pohlig GmbH	www.pohlig.net/de/legal/datenschutzerklaerung
VIGO	www.vigogroup.eu/privacy

The contact details for the listed companies may be found at <https://www.ottobock.com/en/company/locations/>

VIII. Changes to this privacy policy

We reserve the right to adapt or update this data protection declaration if necessary in compliance with the applicable data protection regulations. In this way, we can adapt it to the current legal requirements and take into account changes to our services, e.g. when introducing new services.

The current version applies to your visit. Date: 1 September 2022