Privacy Policy for GxTraceMed

Effective Date: Jan 1st 2025
Last Updated: Jan 1st 2025

At **Gerresheimer**, we take your privacy seriously. This Privacy Policy explains how Sensile Medical AG handles your information when you use our mobile app, **GxTraceMed**. It also outlines your rights and how you can contact us if you have any questions.

---

1. About GxTraceMed

GxTraceMed is a mobile application designed to help care personnel to check medication's information, its "Instruction for Use" based on scanning the primary packaging e.g. a syringe or a vial. It's specifically intended for professional use by internal staff and external partners.

The controller for GxTraceMed is:

Sensile Medical AG
- a company of the Gerresheimer group -
Solothurnerstrasse 235
4600 Olten
Switzerland

E-Mail: traceability@gerresheimer.com

Representative in the EU:

Gerresheimer AG
Klaus Bungert Str. 4
40468 Düsseldorf
Germany

E-Mail: info_digital@gerresheimer.com

2. The Information We Collect

We only collect the information necessary to make GxTraceMed work efficiently. Here's what we handle:

2.1 User Account Information

- **Email Address for Login:**
  - To access GxTraceMed, users are assigned a unique and pseudonymized email address by our organization administrator. This email is managed through Azure AD B2C and is used solely for login purposes.
- **No Use of Apple ID or Personal Email:**
  - Your Apple ID or any personal email associated with your Apple account or Google Store is only used for accessing the App Store to download the application.
  - GxTraceMed does **not** collect, store, or use your Apple ID or any personal email for login or any functionality within the app.
- **Randomly Assigned Login Credentials:**
  - The administrator assigns a random email and password specifically for your access to GxTraceMed. This account is managed securely within the Azure AD system and is separate from any personal accounts you may have.
- **No Collection of Personal Identifiers:**
  - GxTraceMed does not collect or store your name, phone number, or other personal identifiers.

Important Note:

- Your **Apple ID or personal email** is not collected, stored, or used within GxTraceMed. Any requests regarding Apple account data should be directed to Apple, as we do not process or store such information.
- The email used for login to GxTraceMed is assigned and managed by your administrator and is independent of your personal identifiers.

2.2 Scan Metadata

- **Timestamp:** Recorded each time you scan a product's 2D Data Matrix code. This helps us track scan activity and improve app functionality.

2.3 Complaint Details

- **Complaint Content:** Information about the issue you report (e.g., product discrepancies, dimensional issues).
- **No Personal Identifiers:** Complaints are linked to your organization but not to you personally.

3. How We Use Your Information

We use the information collected to:

- Allow you to scan 2D barcodes and retrieve product details.
- Ensure data visibility is limited to your organization for confidentiality.

We **do not** use your data for marketing, analytics, or other unrelated purposes.

Should the processing be subject to the EU General Data Protection Regulation ("GDPR"): The legal basis for the processing of personal data is the performance of a contract (article 6 para. 1 lit. b GDPR) and the improvement of our products (article. 6 para. 1 lit. f GDPR).

---

4. How We Protect Your Data

We are committed to keeping your data safe and secure. Here's how we protect it:

- **Data Encryption:** All data is transmitted securely using encrypted connections.
- **Access Control:** Data access is restricted to your organization, ensuring others cannot view your scans or complaints.
- All personal data is processed and archived in Switzerland and the EU.
- To operate the systems, we work with certified service providers (processors) in the EU (e.g. IT providers, such as Microsoft).

---

5. Data Sharing

All information stays within our system and is used solely to provide the app's core functionality. In connection with the purposes set forth in Section 3 we disclose your personal data in particular to the categories of recipients listed below.

- Within Gerresheimer Group: Gerresheimer Group companies in Switzerland and in the EU/EEA have access to this data for evaluation purposes and to improve our product quality.
- Service Provider: We work with Service Providers in Switzerland and the EU who process data on our behalf. The App database and backend system is hosted on Microsoft Azure's infrastructure in the EU.

6. How Long We Keep Your Data

Personal data that we process (pseudonymized e-mail address) is processed and stored as long as it is necessary for the user to access the app. If a user is inactivated, their personal data will be deleted after the retention period.

---

7. Your Rights

You have certain rights regarding your data. These rights ensure transparency and give you control over the information associated with your use of GxTraceMed.

In accordance with applicable law, you may, in particular, request information about the processing of your personal data, have inaccurate personal data rectified, request the deletion of personal data, object to data processing, request the release of certain personal data in a standard electronic format or its transfer to other data controllers or revoke consent with effect for the future, insofar as our processing is based on your consent.

To exercise your rights, please contact us at traceability@gerresheimer.com. We're here to assist with any questions or concerns about your data.

---

8. Changes to This Privacy Policy

We may update this Privacy Policy as needed. The version published here is the current version.

---

9. Contact Us

If you have questions about this Privacy Policy or your data, please reach out to us:

- **Email:** traceability@gerresheimer.com
- **Data Protection Officer (DPO):** dpo.sensile@integratio.com

We're happy to assist with any concerns or requests.

GxTraceMed is designed with your privacy in mind. By using the app, you trust us with your data, and we're committed to keeping it safe, secure, and transparent