

General Privacy Policy

As of November 2024

The protection of personal data and the responsible handling of information that you entrust to us is an important and special concern for us. altona Diagnostics GmbH ("we", "us") processes personal data only in accordance with the legal provisions, in particular the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG). With regard to the terms used, such as "processing" or "controller", we refer to the definitions in Art. 4 of the General Data Protection Regulation (GDPR).

This privacy policy informs you about the type, scope and purpose of the processing of personal data (hereinafter referred to as "data") if you

- visit our website <https://www.altona-diagnostics.com> (hereinafter referred to as "website" or "online offer") (§ 1 - § 6),
- contact us via the contact form or by e-mail (§ 7) and/or
- conclude a contract with us (§ 8 et seq.),
- visit our company pages in a social network (§ 12).

In addition, this privacy policy contains information about cooperation with processors and third parties within the EEA (§ 13) and in third countries (§ 14), the deletion of your personal data and retention periods (§ 16), your rights as a data subject (§ 17) and automated decision-making (§ 18).

With this privacy policy, we would like to inform you about our processing operations and at the same time comply with the legal obligations, in particular from the GDPR.

Controller (Art. 4 (7) EU General Data Protection Regulation (GDPR)):

Name	altona Diagnostics GmbH
Street	Mörkenstr. 12
Zipcode	22767
City	Hamburg
Telephone	+49 40 548 06 76 – 0
Telefax	+49 40 548 06 76 – 10
E-mail	info@altona-diagnostics.com

Owners, board members, managing directors or other managers appointed by law or by the constitution of the company:

Dr. Sönke Friedrichsen	General Manager
Hans Kuhn	General Manager
Dr. Markus Hess	General Manager

Legal notice <https://www.altona-diagnostics.com/en/legal-notice.html>

Data Protection Officer:

You can reach our Data Protection Officer at datenschutz@altona-diagnostics.com or at our postal address with the addition "the Data Protection Officer".

§ 1

General information about the collection of personal data

1. In the following, we are providing information about the collection of personal data by us. Personal data is all data that can be related to you personally, e.g. name, address, e-mail address, user behavior.
2. We ask you to regularly inform yourself about the content of our privacy policy. We will adapt the privacy policy as soon as the changes in the data processing we carry out make it necessary. We will inform you as soon as the changes require you to cooperate (e.g. consent) or other individual notification.
3. In accordance with Art. 13 GDPR, we inform you of the legal basis of our data processing in this privacy policy and, if applicable, in special communications (e.g. when sending newsletters). If the legal basis is not mentioned in the privacy policy or a special notice, the following applies: The legal basis for obtaining consent is Art. 6 (1) (a) and Art. 7 GDPR, the legal basis for processing for the performance of our services and implementation of contractual measures as well as answering inquiries is Art. 6 (1) (b) GDPR, the legal basis for processing to comply with our legal obligations is Art. 6 (1) (c) GDPR, and the legal basis for processing for the purposes of our legitimate interests is Art. 6 (1) (f) GDPR. In the event that the vital interests of the data subject or another natural person necessitate the processing of personal data, Art. 6 (1) (d) GDPR serves as the legal basis.

§ 2

Collection of personal data when you visit our website

1. If you use the website for informational purposes only, i.e. if you do not register or otherwise transmit information to us, we only collect the personal data that your browser transmits to our server or that of our host (cf. § 6). If you want to view our website, we collect the following data, which is technically necessary for us to display our website to you and to ensure stability and security (the legal basis is our legitimate interest in accordance with Art. 6 para. 1 sentence 1 (f) GDPR):
 - IP address
 - Date and time of the request
 - Time zone difference to Greenwich Mean Time (GMT)
 - Content of the request (concrete page)
 - Access status/HTTP status code
 - Respective amount of transferred data
 - Website from which the request comes
 - Browser
 - Operating system and its interface
 - Language and version of the browser software.
2. The aforementioned information will be stored for a maximum period of 7 days for the purposes mentioned and then deleted. Data whose further retention is necessary for evidentiary purposes is exempt from deletion until the respective incident has been finally clarified.

§ 3

Cookies & web analytics

1. In addition to the above data, cookies are stored on your computer when you use our website. Cookies are small text files that are stored on your hard drive associated with the browser you are using and through which certain information flows to the entity that sets the cookie

(in this case by us). Cookies cannot run programs or transmit viruses to your computer. They serve to make the Internet offer more user-friendly and effective overall.

2. Use of cookies:

a) This website uses the following types of cookies, the scope and functionality of which are explained below:

- Transient cookies (see b)
- Persistent cookies (see c).

b) Transient cookies are automatically deleted when you close the browser. These include, in particular, session cookies. These store a so-called session ID, which can be used to assign various requests from your browser to the common session. This allows your computer to be recognized when you return to our website. The session cookies are deleted when you log out or close the browser. The legal basis for the use of transient cookies is our legitimate interest in providing our website in accordance with Art. 6 (1) (f) GDPR.

c) Persistent cookies are automatically deleted after a specified period of time, which may differ depending on the cookie. You can delete cookies at any time in the security settings of your browser. The legal basis for the use of persistent cookies is your consent in accordance with Art. 6 (1) (a) GDPR. You can configure your browser settings according to your preferences and, for example, refuse to accept third-party cookies or all cookies. When accessing our website, the visitor is informed about the use of cookies for analysis purposes by displaying a banner and his consent to the processing of the personal data used in this context is obtained. We would like to point out that you may not be able to use all the functions of this website if you do not give your consent.

d) A general objection to the use of cookies used for online marketing purposes can be declared for a large number of services, especially in the case of tracking, via the US site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/>.

3. In addition, you can install plugins in your browser to protect your privacy, which offers the possibility to prevent web analytics – e.g. AdBlock, Ghostery or NoScript (please note the privacy policy of the respective plugin provider). In addition, some web analytics providers are members of industry associations, whose websites allow you to centrally prevent usage-based online advertising and web analysis by the respective members. Below you will find the websites of these associations for a convenient cross-provider prevention of web analytics. In this way, you can also prevent the formation of pseudonymous user profiles.

- "European Interactive Digital Advertising Alliance" (EDAA): <http://www.youronlinechoices.com/de/praeferenzmanagement/>
- "Digital Advertising Alliance" (DAA): www.aboutads.info/choice
- "Network Advertising Initiative" (NAI): <http://optout.networkadvertising.org/?c=1>

4. Finally, you can revoke your consent given via the cookie banner by clicking on the "Open cookie agreement settings" button at the bottom of the page and changing your settings in the cookie banner

§ 4

Google Analytics

1. We use Google Analytics, a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google") if you have given us your consent to do so via the cookie banner. Google uses cookies. The information generated by the cookie about the use of the online offer by the users is usually transmitted to a Google server

in the USA and stored there. For details on cookies in general, please refer to § 3 of this privacy policy.

2. Google is certified under the new data protection agreement between the EU and the USA, the so-called Data Privacy Framework, which enables a secure data transfer of personal data to the USA.
3. Google will use this information on our behalf to evaluate the use of our online offer by the users, to compile reports on the activities within this online offer and to provide us with other services related to the use of this online offer and the use of the Internet. Pseudonymous user profiles of the users can be created from the processed data.
4. We only use Google Analytics with IP anonymization activated. This means that the IP address of users is shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there.
5. The IP address transmitted by the user's browser will not be merged with other data held by Google.
6. The user has the option of fully agreeing to the use of cookies by querying in the cookie box ("Accept all"), allowing only essential cookies ("Accept only essential cookies") or making an individual selection ("Manage my options"). You can prevent the storage and collection of the data generated by the cookie and related to your use of the online offer to Google as well as the processing of this data by Google by activating the "Accept only essential cookies" button or by not explicitly activating the "Statistics" button under "Manage my Options". Your choice is stored in a cookie so that your preferences are taken into account on future visits. This decision cookie is one of the "essential cookies".
7. Users can also prevent the storage of cookies by setting their browser software accordingly; users can also prevent the collection of the data generated by the cookie and related to their use of the online offer to Google and the processing of this data by Google by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>. Alternatively, you can withdraw your consent by clicking on the "Revoke Google Analytics" button. In this case, we set a technically necessary cookie that recognizes your withdrawal of consent when you visit our website.

Revoke Google Analytics

8. You can find more information about Google's use of data, settings and objection options in Google's privacy policy (<https://policies.google.com/technologies/ads>) as well as in the settings for the display of advertisements by Google (<https://adssettings.google.com/authenticated>).
9. Users' personal data will be deleted or anonymized after 14 months.

§ 5

Google Maps

1. On our website, we use maps of the "Google Maps" service of the provider Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The processed data may include, in particular, IP addresses and location data of the users, which, however, are not collected without their consent (usually carried out within the framework of the settings of their mobile devices). The data may be processed in the USA.
2. Google is certified under the new data protection agreement between the EU and the USA, the so-called Data Privacy Framework, which enables a secure data transfer of personal data to the USA.

Privacy policy: <https://www.google.com/policies/privacy/>,
Opt-out: <https://adssettings.google.com/authenticated>.

§ 6

Hosting

1. The hosting services used by us serve to provide the following services: infrastructure and platform services, computing capacity, storage space and database services, security services and technical maintenance services, which we use for the purpose of operating this online offer.
2. In doing so, we or our hosting provider, process inventory data, contact data, content data, contract data, usage data, meta and communication data of customers, interested parties and visitors to this online offer on the basis of our legitimate interests in an efficient and secure provision of this online offer in accordance with Art. 6 (1) (f) GDPR in conjunction with Art. 28 GDPR (conclusion of a data processing agreement). You can see the scope of the data collected in § 2 and § 3 of this privacy policy.

§ 7

Making contact by e-mail or contact form

1. When you contact us by e-mail or via the contact form (<https://altona-diagnostics.com/contact/>), the data you provide (your e-mail address, if applicable, your name and your telephone number) will be stored by us in order to answer your questions individually. We delete the data generated in this context after storage is no longer necessary or restrict processing if there are statutory retention obligations.
2. The legal basis is either the fulfillment of a contractual obligation, measures to initiate a contract or our legitimate interest in providing a contact form (Art. 6 (1) (b) and (f) GDPR). You are not obliged to contact us via the contact form or by e-mail, nor to provide any personal data. If you do not provide your personal data, we may not be able to process your request. Otherwise, there will be no consequences for you. We may store contact requests for up to three years and six months based on our legitimate interests before deleting them in order to be able to prove a previously given consent or business contact. The processing of this data is limited to the purpose of a possible defense against claims. An individual request for deletion is possible at any time, provided that the previous existence of the contact is confirmed at the same time. The storage of the aforementioned data is based on our legitimate interests in accordance with Art. 6 (1) S. 1 (f) GDPR.

§ 8

Processing of your data when you contact us for business purposes

1. We process inventory data (e.g. names and addresses as well as contact details of users), contractual data (e.g. services used, names of contact persons, payment information) for the purpose of fulfilling our contractual obligations and services in accordance with Art. 6 (1) (b) GDPR. The entries marked as mandatory in online forms are necessary for the initiation of a contract.
2. The data will be deleted after the expiry of statutory warranty and comparable obligations, and the necessity of storing the data will be reviewed every three years; in the case of the statutory archiving obligations, the deletion takes place after their expiry.
3. In addition, insofar as this is necessary for the initiation or execution of contractual relationships, we also process data of persons with whom there is no (direct) contractual relationship. For example, we may process your data if you are a representative, contact person or employee of a company that is our contractual partner. In this case, the legal basis is our legitimate interest in initiating or executing the respective contractual relationship (Art. 6 (1) (f) GDPR) with your employer.

§ 9

Ordinary contact by way of business operations (e.g. trade fair)

1. In the ordinary course of business, situations may arise in which a notification pursuant to Art. 13 and Art. 14 GDPR cannot usually be made. These are above all cases such as the spontaneous exchange of business contact data at trade fairs, events, business lunches or other official activities, e.g. through the exchange of business cards or the first contact by us or by you with business content.
2. We regularly collect the following data from you in such situations: contact details, such as your name, address, email or telephone number, data about your company, such as address, e-mail, business area, job description, title, data about your request, such as content, time of the request, means of communication.
3. This data is processed for storage in our contact databases in the context of business activities, such as e-mail programs, telephone directories, etc. for the purpose of resuming contact and/or processing your request and further processing.
4. The processing of your data for these purposes is carried out on the basis of Art. 6 (1) (f) GDPR and is in our legitimate interest. Our legitimate interest is to contact you for a possible business initiation, to resume contact and/or to process your request and further processing.

§ 10

Administration, financial accounting, office organization, contact management

1. We process data in the context of administrative tasks as well as the organization of our operations, financial accounting and compliance with legal obligations, such as archiving. In doing so, we process the same data that we process in the context of the provision of our contractual services. The processing bases are Art. 6 (1) (c) GDPR, Art. 6 (1) (f) GDPR. Customers, interested parties, business partners and website visitors are affected by the processing. The purpose and our interest in the processing lies in administration, financial accounting, office organization, archiving of data, i.e. tasks that serve to maintain our business activities, perform our tasks and provide our services. The deletion of data with regard to contractual services and contractual communication corresponds to the information provided in these processing activities.
2. In doing so, we disclose or transmit data to the tax authorities, consultants, such as tax advisers or auditors, as well as other fee offices and payment service providers.
3. Furthermore, on the basis of our business interests, we store information on suppliers, event organizers and other business partners, e.g. for the purpose of contacting us later. As a matter of principle, we store this data, which is mainly company-related, permanently.

§ 11

Social networks and embedded YouTube/Vimeo videos

Our website contains links to social networks (e.g. LinkedIn, Xing, YouTube, Vimeo). We have also integrated videos about the providers Vimeo and YouTube on our website. Both Vimeo and YouTube are platforms for video hosting. These services are operated exclusively by third-party service providers. If you follow the links or play videos, information may be transmitted to these providers. We use the so-called "two-click solution" for links to social networks. This means that when you visit our site, no personal data is passed on. Only when you click on one of the social share buttons or watch embedded videos is data transmitted to the respective provider. For the purpose and scope of the data collection and the further processing and use of the data by the provider, as well as your rights in this regard and setting options to protect your privacy, please refer to the privacy policy of the respective provider. You can find them here:

- LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA
<http://www.linkedin.com/legal/privacy-policy/>

- New Work SE (Xing), Am Strandkai 1, 20457 Hamburg
<https://privacy.xing.com/en/privacy-policy>
- Vimeo.com, Inc., 555 West 18th Street New York, NY 10011, USA;
<https://vimeo.com/privacy> and
- YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA
<https://policies.google.com/privacy?hl=de&gl=de>.

§ 12

Joint responsibility with social network operators

1. We maintain company pages on the social networks of LinkedIn, Facebook, Instagram, YouTube and Xing. As the operator of these pages, we are responsible for the collection (but not for the further processing) of the data of visitors to our company pages together with the respective operator of the social network within the meaning of the GDPR:
 - **LinkedIn:** LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland
 - **Facebook:** Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland
 - **Instagram:** Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland
 - **Vimeo:** Vimeo.com, Inc., 555 West 18th Street New York, NY 10011, USA;
 - **Xing & Kununu:** New Work SE, Am Strandkai 1, 20457 Hamburg
 - **YouTube:** Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA
2. The data collected includes
 - Information about the types of content visitors view or interact with, or the actions they take as well as
 - Information about the devices used by visitors (e.g. IP addresses, operating system, browser type, language settings, cookie data).
 - Social networks also collect and use information to provide analytics services called "site insights" to site operators to provide them with insights into how people interact with their pages and with the content associated with them.
3. We have concluded a special agreement with the respective operator of the social network:
 - **LinkedIn:** "Page Insights Joint Controller Addendum", <https://legal.linkedin.com/pages-joint-controller-addendum>
 - **Meta (Facebook and Instagram):** "Information on Page Insights", https://www.facebook.com/legal/terms/page_controller_addendum
 - **Vimeo:** <https://vimeo.com/privacy>
 - **Youtube:** [Privacy Policy](#) and [Terms of Use](#) of Google
 - **Xing & Kununu** The General [Terms and Conditions](#) of Xing and the guidelines referred to therein

These regulate in particular which security measures the operator must observe and in which the operator has agreed to comply with the rights of the data subject (i.e. users can, for example, direct information or deletion requests to the operator of the social network).

4. The rights of visitors (in particular to information, deletion, objection and complaint to the supervisory authority) are not restricted by the agreements with the respective operator. You can assert your rights (information, correction, deletion, restriction of processing, data portability, objection and complaint) both against us and against the respective operator of the social network.

- Purposes of processing: Contact requests and communication, tracking (e.g. interest/behavioral profiling, use of cookies), remarketing, reach measurement (e.g. access statistics, recognition of returning visitors).
 - Legal basis: The legal basis for data processing is our legitimate interest in the widest possible presence of our offer and our company on the Internet as well as the possibility of communicating with you via social networks (Art. 6 (1) (f) GDPR).
 - Data subjects: website visitors, visitors from our company pages on social networks.
5. With LinkedIn, Facebook, Instagram and YouTube, there is the possibility that some of the information collected will also be processed outside the European Union, e.g. in the USA. Data transfers are made on the basis of standard contractual clauses. The operators of the social networks and their affiliated companies are thus contractually obliged to process data in compliance with data protection regulations. In addition, Meta Platforms, Inc. (Facebook, Instagram) and Google LLC in particular are additionally certified according to the new data protection agreement between the EU and the USA, the so-called Data Privacy Framework. LinkedIn is not yet certified.
 6. For more information on the handling of personal data, please refer to Meta's privacy policy ([Facebook](#), [Instagram](#)), [LinkedIn](#), [YouTube](#), [Vimeo](#) and [Xing](#).

§ 13

Recipients of personal data

We only transfer personal data to third parties to the extent that this is necessary for the provision of our service or is required by law in this context. Within the scope of the purposes stated here, personal data is forwarded to service providers who work for us and support us in particular in the provision of services. In addition to their legal obligation to comply with all data protection regulations by us, these service providers are bound by other contractual requirements on data protection. This includes, in particular, an obligation as a processor pursuant to Art. 28 GDPR. In particular, we have shared personal information with the following categories of service providers:

- Accounting, financial institutions, tax and legal advice;
- IT service and infrastructure, e.g. for the application process;
- IT support and maintenance;
- Data destruction and facility services;
- In addition to the categories already mentioned, other categories of service providers may exist or be added.

Otherwise, we only transmit personal data to other recipients if there is a legal permission to do so or if you have given your prior consent. You can revoke any consent you may have given at any time with effect for the future. We only pass on your data to government agencies within the framework of the legal obligations or on the basis of an official order or court decision and only to the extent that this is permissible under data protection law.

§ 14

Transfers to third countries

1. If we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or if this happens in the context of the use of third-party services or disclosure or transfer of data to third parties, this is done exclusively for the fulfillment of our (pre-)contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we will only process or have the data processed in a third country if the special requirements of Art. 44 et seq. GDPR are met. The processing is therefore carried out, for example, on the basis of special guarantees, such as the officially recognized determination of a level of data protection corresponding to the EU (e.g. for the USA, if certification under the "Data Privacy Framework"

is available) or compliance with officially recognized special contractual obligations (so-called "standard contractual clauses") Google is certified under the Data Privacy Framework. A complete list of companies certified under the Data Privacy Framework can be found here: <https://www.dataprivacyframework.gov/s/>.

2. If you have any questions about this, please contact our Data Protection Officer (see contact details above).

§ 15

Security measures

1. In accordance with Art. 32 GDPR, we take appropriate technical and organizational measures to ensure a level of protection appropriate to the risk, taking into account the state of the art, the implementation costs and the type, scope, circumstances and purposes of the processing, as well as the different probability of occurrence and severity of the risk to the rights and freedoms of natural persons; The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical access to the data, as well as access, input, disclosure, availability and separation. Furthermore, we have put in place procedures to ensure that the rights of data subjects are exercised, data is deleted and that data is compromised. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and processes, in accordance with the principle of data protection through technology design and through data protection-friendly default settings (Art. 25 GDPR).
2. To protect the personal data of our users, we use a secure online transmission method called "Secure Socket Layer" (SSL) transmission. You can recognize this by the fact that an "s" is appended to the address component http:// ("https://") or a green, closed lock symbol is displayed. By clicking on the icon, you will get information about the SSL certificate used. The display of the icon depends on the browser version you are using. SSL encryption ensures the encrypted and complete transmission of your data.

§ 16

Deletion of data

1. The data processed by us will be deleted or restricted in its processing in accordance with Art. 17 and 18 GDPR. Unless expressly stated in this privacy policy or in an agreement between us and you, the data stored by us will be deleted as soon as it is no longer necessary for its intended purpose, and the deletion does not conflict with any statutory retention obligations. If the data is not deleted because it is necessary for other and legally permissible purposes, its processing will be restricted; i.e. the data will be blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.
2. According to legal requirements in Germany, storage is carried out in particular for 6 years in accordance with Section 257 (1) of the German Commercial Code (HGB) (commercial books, inventories, opening balance sheets, annual financial statements, commercial letters, accounting documents, etc.) and for 10 years in accordance with Section 147 (1) of the German Fiscal Code (books, records, management reports, accounting documents, commercial and business letters, documents relevant to taxation, etc.).
3. If civil law claims against us could still arise from certain transactions, the storage takes place until the expiry of the limitation periods, taking into account possible suspensions of the limitation period, i.e. usually for 10 years plus six months.

§ 17

Your rights

1. You have the following rights vis-à-vis us in relation to personal data concerning you:
 - right to access: The right to request access about the personal data stored by us about you (Art. 15 GDPR),
 - right to rectification of inaccurate data (Art. 16 GDPR)
 - the right to erasure of data that may no longer be stored (Art. 17 GDPR),
 - the right to restriction of processing in certain cases (Art. 18 GDPR),
 - right to data portability, i.e. to the transfer of data that you have provided in electronic form to you or to a third party (Art. 20 GDPR) and
 - the right to withdraw any consent given against the processing with effect for the future (Art. Art. 7 (3) GDPR). Please note that in the event of a withdrawal, we will continue to retain your consent. This is because we must be able to prove consent even after a withdrawal and deletion of your personal data. The legal basis for the (also continued) retention of consent is Art. 6 (1) (c) in conjunction with Art. 5 (1) (a), (2), Art. 7 (1) GDPR and Art. 6 (1) (f) GDPR.

In addition, you can object to the processing if it is based on legitimate interests (Art. 6 (1) (f) GDPR or Art. 6 (1) (e) GDPR (Art. 21 (1) GDPR) or is carried out for direct marketing purposes (Art. 21 (2) GDPR), whereby you must demonstrate a special reason, except in the case of direct marketing.

2. You also have the right to complain to a data protection supervisory authority about the processing of your personal data by us (Art. 77 GDPR).
3. If you have any questions or complaints about data protection with us, we recommend that you first contact our Data Protection Officer (see the contact details above).

§ 18

No automated case-by-case decision

We do not use your personal data for automated decisions on a case-by-case basis within the meaning of Art. 22 (1) GDPR.

§ 19

Changes to the privacy policy

New legal requirements, business decisions or technical developments may require changes to our privacy policy. The privacy policy will then be adapted accordingly. You can always find the latest version on our website.