

DATA PROTECTION STATEMENT OF «TOGETHERWETEST.CH»

Status as at: 29 October 2021

1. Introduction

Hirslanden AG, Zurich (HIRSLANDEN) operates the online platform “TOGETHER WE TEST” (ONLINE PLATFORM). With the ONLINE PLATFORM, HIRSLANDEN makes it possible for the TEST COMPANIES to carry out tests with the support of PARTNER COMPANIES. This data protection statement explains the processing of personal data by the units involved. More information about these units and their activities can be found in the TWT GTC, which can be downloaded from the TOGETHERWETEST web-site (www.togetherwetest.ch).

2. Who is the responsible party under data protection law?

Under data protection law, a specific unit is “responsible” for every case of data processing, either on its own or together with other units. Information about this responsibility is provided in section 3.

Any questions regarding this explanation or other concerns related to data protection can be addressed to the unit that is responsible for processing. However, it is easiest for us to help you if you contact the data protection officer of Hirslanden AG: datenschutz@hirslanden.ch.

Enquiries about the offer and operational processing of TOGETHERWETEST, including the use of the ONLINE PLATFORM, can be addressed to support@togetherwetest.ch.

3. Which units process which data for which purposes?

a. Carrying out tests: TEST COMPANIES and LABORATORIES process personal data in joint responsibility for the purpose of carrying out organised pool tests. These include the following categories of personal data in particular:

- Information about TEST PARTICIPANTS: Name, residential address if available, function/department, e-mail address and/or mobile phone number, code and result of the pool, provided that the pool is managed via the platform
- Information about TEST PARTICIPANTS who use the COVID certificate option: Full name and date of birth for the issuing of the certificate by the Federal Office of Information Technology.

TEST COMPANIES and LABORATORIES also process the name, legal form and address/registered office of the company in question as well as the names, functions and contact data of the contact persons.

HIRSLANDEN, TEST COMPANIES and LABORATORIES process personal data in joint responsibility for the purpose of carrying out random pool tests. These include the following categories of personal data in particular:

- Information about TEST PARTICIPANTS: Full name, date of birth, e-mail address and indication whether a COVID certificate is required in the event of a negative result

- Information regarding the health insurer of TEST PARTICIPANTS whose test costs are covered by the health insurer and information on the means of payment for TEST PARTICIPANTS paying for their test.

For individual tests, the following categories of personal data are stored and processed by TEST COMPANIES, LABORATORIES and, if the test is done following a random pool test, by HIRSLANDEN:

- Information about TEST PARTICIPANTS: The LABORATORY (partner company) collects from the TEST COMPANY the name, gender, date of birth, residential address, e-mail address and/or mobile phone number as well as information about the health insurer. It informs the TEST PARTICIPANT directly of the test result.

b. Further use of test results: Where a TEST COMPANY processes TEST PARTICIPANTS' personal data after the mentioned test procedure, it does so at its own responsibility for the purpose of implementing protective measures, provided that it does not inform about any further purposes for processing.

c. Logistics: In order to fulfil orders, PARTNER COMPANIES at their own responsibility process data about the TEST COMPANY, in particular the name, legal form and address/registered office of the company as well as the names, functions and contact data of the contact persons.

d. Contract administration: TEST COMPANIES, PARTNER COMPANIES and HIRSLANDEN AG may at their own responsibility process data concerning the other companies for the purpose of contract administration, in particular the name, legal form and address/registered office as well as the names, functions and contact data of contact persons.

e. Communication: HIRSLANDEN and PARTNER COMPANIES process personal data at their own responsibility to provide, manage and conduct customer communications by post, telephone or electronic means of communication. When contact is established with TOGETHERWETEST, information and the contents of communication are saved in order to process and answer related queries.

f. Statistics and research: HIRSLANDEN prepares statistical evaluations based on anonymised user data. These also include the organisation and execution of anonymised statistical epidemiological evaluations and notifications to the cantons. Statistical evaluations may be used or forwarded for the purpose of research about the development of the COVID-19 pandemic, provided that the data are fully anonymised and it is impossible to draw conclusions about the identity of any individual person. If personal data are used for such purposes, the prior consent of the affected person must be obtained. Further legal requirements (e.g. under the Human Research Act) remain reserved.

g. Use of the WEBSITE

HIRSLANDEN operates the WEBSITE at its own responsibility. Each time the WEBSITE is called up, the system automatically collects the following data about the computer system from which the WEBSITE was accessed:

- (1) Browser type and version
- (2) The user's operating system
- (3) The user's internet service provider
- (4) The user's anonymised IP address
- (5) Date and time of access
- (6) Referring websites that redirect the user's system to our WEBSITE
- (7) Websites that are accessed by the user's system via our WEBSITE
- (8) Language and country settings

(9) Geolocation data

The WEBSITE also uses cookies. Cookies are text files stored in or by the web browser on the user's computer. When a user visits a website, for example, a cookie can be stored in the user's operating system. This cookie contains a unique string of characters that make it possible to identify the browser the next time the user visits the website.

Cookies are used to make the WEBSITE secure. They are used exclusively for user authentication, to protect forms and to detect attempts at fraud. Certain elements of the WEBSITE therefore require that it be possible to identify the browser again after switching from the WEBSITE. Cookies store and send the following data:

- Login information
- Referring websites that redirect the user's system to the WEBSITE
- Websites that are accessed by the user's system via the WEBSITE
- Language and country settings
- Geolocation data

When accessing the WEBSITE, the user will be notified about the use of cookies and asked to give their consent to the use of their personal data for these purposes. In this context, the user will be referred to this data protection statement. The use of secure and interactive services and features is only possible with cookies.

The purpose of using technically necessary cookies is to make the use of websites safe for users. Some functions of the WEBSITE cannot be offered without the use of cookies. Such features require that it be possible to recognise your browser again after switching from the WEBSITE.

Cookies are stored on the user's computer and are transmitted by the computer to our WEBSITE. This gives you as the user complete control over the use of cookies. By changing the settings in your web browser, you can disable or restrict the transfer of cookies. Cookies that have already been stored can be deleted at any time. This can also be done automatically. If cookies are disabled for the WEBSITE, it may no longer be possible to fully use all of the features of the WEBSITE.

h) Further purposes

To the extent required, personal data are also processed at our own responsibility to defend and enforce legal claims, for internal documentation purposes, to guarantee security and IT security, and in the context of legal obligations, in particular relating to the forwarding of data pursuant to section 5.

5. Forwarding of personal data

HIRSLANDEN, TEST COMPANIES and LABORATORIES may exchange information among each other for the purpose of carrying out tests. LABORATORIES, however, only receive pseudonymised information about TEST PARTICIPANTS. HIRSLANDEN receives personal information about the TEST PARTICIPANTS from the TEST COMPANIES in order to allocate these participants to the relevant pools; in the case of a positive pool, it may forward these to the LABORATORY for LABORATORIES working with retain samples. If the individual test option is used, the PLATFORM forwards personal information about the TEST PARTICIPANTS who carry out an individual test to the responsible LABORATORY.

In relation to the implementation of the federal government's Epidemics Act and the implementing ordinances of the federal government and the cantons regarding the

COVID-19 pandemic, HIRSLANDEN, PARTNER COMPANIES, TEST COMPANIES as well as third parties involved for contract fulfilment forward personal data to third parties for the purpose of epidemic control, for invoicing purposes based on the statutory or contractual foundations, and for the purpose of issuing COVID certificates.

In order to pursue legal claims, HIRSLANDEN, PARTNER COMPANIES and third parties involved in the matter may disclose personal data to the competent official and judicial instances, provided that this is required for the assertion and enforcement of the claims.

Instructions under procedural law by the authorities, criminal prosecuting authorities and courts to disclose personal data based on statutory foundations are also reserved.

6. Involvement of service providers

Third parties may be involved for services such as the operation of the ONLINE PLATFORM or for communications. Consulted third parties are contractually obliged to process personal data exclusively in accordance with their mandate and instructions and to implement the required technical and organisational security measures. If the service providers are located in countries that do not have laws which provide for a level of personal data protection comparable to Swiss regulations, we make sure that these service providers comply with the Swiss level of data protection.

The following service providers are involved in TOGETHERWETEST:

Service provider	Activity	Country
Neolution AG, Pfäffikon SZ	Development and operation of the TOGETHERWETEST platform	Switzerland
Microsoft Schweiz AG	Hosting (data)	Switzerland
Google Schweiz AG	Hosting (web frontend)	Switzerland
Swisscom Schweiz AG	SMS dispatch	Switzerland
MailGun Delaware (USA)	Mail dispatch	Mail routing is only done for the Europe region
Federal Office of Information Technology	Creation of COVID-19 certificates	Switzerland
TWINT AG	Payment processing	Switzerland
Stripe	Payment processing	USA, California

7. How long are my data stored?

All stored personal data are erased or anonymised as soon as they are no longer required for the purposes for which they were collected and provided that the law does not oblige or authorise the collector of the data to store the data.

8. How do we protect your data?

We have taken technical and organisational measures that ensure appropriate data protection, also by the consulted service providers. The unencrypted transfer of data over public networks (e.g. when sending us messages or other information) may be read by, changed or destroyed by unauthorised third parties.

9. What are my rights?

In accordance with the legal requirements and subject to the statutory restrictions and exceptions, you are entitled to request **information** about your stored personal data at

any time. You may also at any time contact the responsible body to request the **rectification, transmission**, partial or complete **erasure** as well as **blocking** of individual items of personal data, provided this does not conflict with any legal obligations of safekeeping or retention. Under certain circumstances, you also have the **right to lodge a complaint** with a relevant data protection supervisory authority.

You may also make use of your **right to object** to data processing at any time and without giving a reason.

10. How is this statement updated?

Parts of the data protection statement may be amended or updated without prior notice. Should we make any major changes, you will be notified accordingly. Please always review the data protection statement to ensure you are aware of any changes or updates.