

# Data Privacy Statement

<b>Controller (as defined by GDPR):</b> GCP-Service International Legal Representative: Dr. Andreas Grund, Kai Schuirmann & Jiri Paseka Anne-Conway-Str. 2 28359 Bremen Germany  Email: <a href="mailto:info@gcp-service.com">info@gcp-service.com</a>	<b>Data Protection Officer:</b> Benjamin Tsiflidis GCP-Service International Anne-Conway-Str. 2 28359 Bremen Germany  Email: <a href="mailto:dataprotection@gcp-service.com">dataprotection@gcp-service.com</a>
--	--

We appreciate your interest in our websites and services.

GCP-Service International takes the protection of your personal data very seriously. In this privacy statement, we inform you about the data collected during your visit to our websites, the purpose for your data collection and how it is processed as well as the legal basis for the processing. In addition, we inform you about the rights to which you are entitled.

## 1. Data collection & use

### a) Access over the internet

When you visit one of our websites, our web server makes a temporary record of each access and stores it in a log file. The following data is recorded and stored:

- Your IP address
- Date and time of access
- Browser type and operating system
- Referrer URL (the previously visited page)
- Name of your internet service provider

The purpose of recording these data is to allow use of the website, for system security, for technical administration of the network infrastructure and to optimize our internet service. The IP address is only evaluated, if there exists a justified suspicion of an illegal use based on concrete indications.

The data processing is legally based on *Art. 6 para. 1 f) GDPR* and in our interest to be able to display our website as reliable and as trouble-free as possible to you. We store the remaining data resulting from the informational use for a period of 3 years, if there is no deletion order from you.

### b) Contact form (gcp-service.com)

If you decide to contact us via our contact form, we collect the following data:

- Your name
- Your email
- Subject of your message
- Your message

We use this information to respond to your request via email. Additionally, we can use your information to personally tailor our response to you and provide you with specific information for your business. You provide us the data on a voluntary basis through completion of the contact form.

The data processing is legally based on *Art. 6 para. 1 f) GDPR* and in our interest to be able to answer your request with the information that is relevant to you. Your data collected via the contact form and the communication to answer your request will be stored for 3 years, provided there is no deletion order from you.

### c) Online training registration (clintrain.com)

If you decide to sign up for one of our online trainings, we collect the following data via our registration forms:

- Your Gender
- Title (optional)
- Your first name
- Your last name
- Your street, ZIP code, city and country (address)
- Your email
- Your telephone number (optional)
- Your continuous medical education (CME) number (optional)
- Your Profession (optional)
- Your Medical Specialty (optional)
- Your VAT Regional number (optional)
- Your start date of your online training and your username
- Your Comments (optional)

We use this information to confirm your registration and to contact you with regards to your online training. In addition, we use your data to create your user account in our training platform and the respective invoices and login forms for your training. In case, you provided to us your CME number, we will forward your CME points to the appropriate medical council (Bundesärztekammer, EIV) once you have successfully completed your online training. Also, if you have ticked the box “I would like to receive your Newsletter 3-4 times per year”, we will use your email address to send you newsletters.

The processing of your personal data is legally based on *Art. 6 para. 1 b) GDPR* as any participation in one of our online trainings is based on a contractual relationship. Your personal data used for the registration will be stored for 5 years due to the archiving regulations of the medical council and our discount system, provided there is no deletion order from you.

#### d) Cookies

We use cookies to recognize you as a user when calling multiple pages sequentially, to personalize our websites' content for you and to provide social media features to you. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

Cookies are small text files that make it possible to store user-specific information on the user's access device and make user's experience more efficient.

The law states that we can store cookies on your device if they are strictly necessary for the operation of our website. For all other types of cookies, we need your permission.

- “clintrain.com” uses following Cookies:

<i>Mandatory cookies</i>				
Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.				
Name	Provider	Function	Duration	Type
authchallenge	clintrain.com	Saves the Autoplay settings	Session	HTTP
CookieConsent	clintrain.com	Saves the user's cookies consent state for the current domain	1 year	HTTP
csrftoken	clintrain.com	Helps to prevent Cross-Site Request Forgery- (CSRF-) Attacks	1 year	HTTP
ilClientId	clintrain.com	Preserves the name of the current ILIAS Client. Is used	Session	HTTP

		to identify which client is being used.		
ilPresentationAutoplay	clintrain.com	Saves the autoplay's user settings during online trainings	Session	HTTP
iltest	clintrain.com	Tests whether cookies can be used for the autoplay function	Session	HTTP
PHPSESSID	clintrain.com	Preserves the users' conditions for all page requests	Session	HTTP
__cfduid	mathjax.org	Used by the content-network Cloudflare to identify trustworthy web traffic	1 year	HTTP

### *Statistics*

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

_ga	clintrain.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	2 year	HTTP
_gat	clintrain.com	Used by Google Analytics to throttle request rate	Session	HTTP
_gid	clintrain.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Session	HTTP
collect	clintrain.com	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channel	Session	Pixel

### *Marketing cookies*

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

GPS	youtube.com	Registers a unique ID on mobile devices to enable tracking of the geographical GPS-location	Session	HTTP
PREF	youtube.com	Registers a unique ID which is used by Google to keep statistical data on how visitors are using YouTube videos on different websites	8 months	HTTP
VISITOR_INFO1_LIVE	youtube.com	Tries to estimate users' bandwidth on pages with integrated YouTube videos	179 days	HTTP

YSC	youtube.com	Registers a unique ID which is used to keep statistical data on the YouTube videos which have been watched by the user	Session	HTTP
yt-remote-cast-installed	youtube.com	Stores the user's video player preferences using embedded YouTube video	Session	HTML
yt-remote-connected-devices	youtube.com	Stores the user's video player preferences using embedded YouTube video	Persistent	HTML
yt-remote-device-id	youtube.com	Stores the user's video player preferences using embedded YouTube video	Persistent	HTML
yt-remote-fast-check-period	youtube.com	Stores the user's video player preferences using embedded YouTube video	Session	HTML
yt-remote-session-app	youtube.com	Stores the user's video player preferences using embedded YouTube video	Session	HTML
yt-remote-session-name	youtube.com	Stores the user's video player preferences using embedded YouTube video	Session	HTML

- “gcp-service.com” uses following Cookies:

<i>Statistics</i>				
Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.				
_ga	clintrain.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	2 year	HTTP
_gat	clintrain.com	Used by Google Analytics to throttle request rate	Session	HTTP
_gid	clintrain.com	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Session	HTTP
collect	clintrain.com	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channel	Session	Pixel

You can prevent the use of cookies by making the appropriate settings in your browser. If you choose not to accept cookies, you may not be able to use all functions of our websites.

#### e) Web analysis

This website uses Google Analytics, a web analytics service from Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; referred to as “Google” in the information that follows). Google has an EU-US Privacy Shield certification. The EU-US Privacy

Shield Agreement is designed to guarantee that data transfers to certified US companies are adequately protected.

The features of the service are Universal Analytics features. They make it possible to attribute data, sessions and interactions across multiple devices to a pseudonymous user ID, thus giving us the ability to analyse the activities of a user on our websites. To do that, Google Analytics uses cookies. The statistical data we receive in this way helps us to improve our website and to make it more interesting for you as a user.

The legal basis for the use of Google Analytics is GDPR Article 6 para 1 a), i.e. your consent.

Furthermore, you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

#### **f) Google maps**

We use content from Google Maps to display maps on our websites to make geographic information visually appealing.

The data processing is legally based on *Art. 6 para. 1 f) GDPR* and in our interest to be able to display our company's location on the maps offered by Google Maps on our website.

Google has an EU-US Privacy Shield certification. The EU-US Privacy Shield Agreement is designed to guarantee that data transfers to certified US companies are adequately protected. Google Maps is a service of Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ('Google'). To make maps available to your web browser during a visit of our website, your web browser will connect to a Google server, which may also be located in the United States or outside of the EU. Google receives the information that our website has been visited from the IP address of your device.

## **2. Data transfer to 3<sup>rd</sup> parties**

For the provision of our websites your data will be forwarded to our supporting technical service providers (website hosting).

The transfer of your data to other 3<sup>rd</sup> parties otherwise only takes place to the extent that this data protection statement is explicitly pointed out or we are legally obliged to do so.

## **3. Links to other websites operated by other providers**

Our webpages may contain links to other providers' webpages (e.g. YouTube, LinkedIn). We would like to highlight that this data privacy statement applies exclusively to the webpages managed by GCP-Service International.

## **4. Your rights**

You have following rights with regards to your data:

- Right to request confirmation as to whether your data is being processed, and, where that is the case, access and information to your personal data (*Art. 15 GDPR*).
- Right to demand correction of incorrect personal data and completion of incomplete personal data (*Art. 16 GDPR*).
- Right to deletion of personal data if not in conflict with a statutory retention requirement (*Art. 17 GDPR*).
- Right to restrict the processing of personal data (*Art. 18 GDPR*).
- Right to data portability (*Art. 20 GDPR*). In other words, the right to receive the data that you have provided within a structured, standard and machine-readable format. You may also transmit this data to other sources or have it transmitted by us.
- **Right to object the data processing at any time** (*Art. 21 GDPR*).
- Right to revoke your consent to us at any time.

To exercise your rights, please contact our above-mentioned Data Protection Officer.

- Right to lodge a complaint with a supervisory authority, if you believe that your personal has been violated in the sense of the GDPR (*Art. 77 GDPR*).

## **5. Data Security**

GCP-Service International uses technical and organizational security measures to safeguard stored personal data against inadvertent or deliberate manipulation, loss or destruction and against access by unauthorized persons. Our security measures are continuously improved in line with technological progress.

All access to our websites is secured with 256-bit encryption for your security. You recognize an active encryption on the usually green representation.

Last update: 11.07.2018