

## Privacy Policy Relating to Flu (Influenza) Vaccination

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### 1. Controller

According to the General Data Protection Regulation (GDPR) and other data protection regulations, the controller is:

Karlsruhe Institute of Technology (KIT)  
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Karlsruhe Institute of Technology is a corporation governed by public law. It is represented by the President Professor Dr. Jan S. Hesthaven.

Our Data Protection Commissioner may be contacted at [dsb@kit.edu](mailto:dsb@kit.edu) or by ordinary mail with "Die Datenschutzbeauftragte" (the Data Protection Commissioner) being indicated on the envelope.

### 2. Type and Scope of Data Processing (Including Group of Recipients)

Your personal data are processed for appointment booking (*digital*), medical information, and anamnesis associated with influenza vaccination (*paper-based and independent of appointment booking*). Personal data are all data that can be related to an identified or identifiable natural person according to Art. 4, No. 1 of the GDPR. Your data are processed for organizing appointments as well as for the competent execution and documentation of vaccination. Processing covers the following data:

- When accessing the website for booking the appointment, we will only collect your personal data that are transmitted by your browser to our server according to the settings made by you. These data are stored in so-called server log files. We will collect the following data required for the presentation of the websites and for ensuring stability and security: IP address, date and time of your query, time zone difference to Greenwich Mean Time (GMT), contents of the request (concrete site), access status/HTTP status code, data volume transmitted, website from which the request is made, type of browser. The IP address is anonymized prior to storage in the server log files. The data cannot be related to any persons. These data will not be merged with other data sources. We reserve the right to check the data later on, if there are concrete indications of illegal use.
- For booking the appointment, we collect the form of address, first name and last name, date of birth, company/organizational unit, email address (communication of the appointment), telephone number (accessibility of case of postponements, non-appearance), and for organization purposes the time of vaccination. The data can be accessed exclusively

by authorized staff of the Medical Services (MED) and (regarding the data given when booking the appointment) the SCC system administrators responsible for the underlying software. On the information sheet (in paper form), you will be asked to give your contact data (last name, first name, date of birth, organizational unit) as well as to provide information on your health insurance and medically relevant data (allergies, chronic diseases, prescribed medicine, pregnancy, acute illness).

We collect your name, date of birth, and your company/organizational unit to be able to assign your medical information and consent forms to your person. We need your company data to be able to charge the vaccination costs to your company, if these costs are not borne by your health insurance. The medically relevant data are collected to ensure safe treatment. We need your health insurance data to have the vaccination costs reimbursed partly or completely by your health insurance to KIT.

If you have a statutory health insurance and agree to the transmission of your data to the insurance company, we will transmit your last name, your first name, your date of birth, and the type of vaccine for settlement purposes.

If the cost of the vaccine cannot be settled via your health insurance and you are an employee of KIT, we will transmit your data (last name, first name, employee identification number, and type of vaccination) to Human Resources (PSE/Personalbuchhaltung) to comply with fiscal law obligations according to Art. 3, No. 34, EStG (Income Tax Act).

### **3. Legal Basis**

The legal basis for processing data required for the conclusion of the treatment contract and the execution of the treatment is Art. 6, par. 1, cl. 1, b, GDPR. Your health data may be processed according to Art. 9, par. 2, h, and par. 3, GDPR. Data processing when accessing the booking website is based on Art. 6, par. 1, cl. 1, f, GDPR.

The legal basis for the transmission of your data to the statutory health insurance company is Art. 6, par. 1, cl. 1, a, GDPR, as the data are processed based on your approval. Your approval is of voluntary character.

The legal basis for the transmission of your data to PSE/Personalbuchhaltung is Art. 6, par. 1, cl. 1, b in conjunction with Art. 9, par. 2, h, and par. 3, GDPR.

### **4. Storage Period**

Your data will be stored as long as they will be needed for the execution of vaccination, documentation of your information and consent, guarantee of your health, and potential reimbursement of vaccination costs and as long as legal storage obligations exist. According to Art. 630, f, par. 3, Civil Code (BGB), we are obliged to store your patient file for ten years upon completion of the treatment unless other legal storage periods are specified by other regulations. After this storage period, your data will be deleted, unless you have expressly agreed to further data use.

### **5. Your Rights**

According to Art. 7, par. 3, GDPR, you can revoke your approval any time with effect for the future. This revocation may also refer to certain parts of this policy.

As for the rest, you have the following rights as far as your personal data are concerned:

Right to information (Art. 15, GDPR)

Right to rectification (Art. 16, GDPR)

Right to erasure (Art. 17, GDPR)

Right to restriction of processing (Art. 18, GDPR)

Right to data portability (Art. 20, GDPR)

You have the right to complain about the processing of your personal data by KIT with a supervisory authority (Art. 77, GDPR).