
Data Protection Concept of Medical Bridge Germany GmbH

Preamble:

Status: 12.2021

The present data protection concept of Medical Bridge Germany GmbH (MBG) serves to establish data protection compliant rules for the processing of personal data and to define responsibilities. All employees of Medical Bridge Germany GmbH are obliged to comply with the regulations of this data protection concept.

At the same time, the concept serves to document compliance with the currently valid European General Data Protection Regulation .

This data protection concept was published on the homepage of MBG on 06.12.2021. To increase transparency, multilingual translations have been published on the participant pages of MBG with the same date.

Business purpose of Medical Bridge Germany GmbH:

MBG is a personnel service agency that searches for, selects and trains foreign medical professionals on behalf of domestic medical institutions and accompanies them on their way to Germany.

Responsibility Data Protection Concept:

Due to the number of employees of less than 20 persons, it is not necessary to appoint a data protection officer.

Responsible for data protection in the company are the managing directors

- Thomas Kaessler
- Dietmar Mantel

Continuous improvement of the data protection management system

As data protection officers, the two managing directors are responsible for maintaining their knowledge on an ongoing basis and for keeping abreast of changes and checking their implementation in the company.

For own employees annual trainings are carried out if necessary. The cooperation partners are responsible for training their own employees.

Data protection processes and documentation

A register of processing activities was created together with this concept. It is reviewed annually to ensure that it is appropriate and up to date. At the same time, a risk analysis of the processing activities is carried out.

Order processing

MBG works with various cooperation partners and order processors. The participant data provided to MBG is collected and stored via systems of the cooperation partner QI Consult GmbH. As a wholly owned subsidiary of MBG shareholder Scout Service Holding GmbH, QI Consult GmbH has a special relationship with MBG and is therefore also subject to full control by MBG. The data protection

officer, Thomas Kaessler, is also the managing director and data protection officer of QI Consult GmbH. The data protection processes are therefore fully known to MBG and coordinated with MBG.

Order processing contracts are concluded with all cooperation partners in which the following points are specified:

- Type of personal data
- Categories of data subjects
- Type and purpose of processing
- Subject and duration of the processing
- Rights and obligations of the data controller.

Technical and organizational data protection measures

Due to the small number of employees at MBG, data protection measures focus on technical measures and rules of conduct. These included standard measures such as up-to-date operating systems, password protection, regular backups and virus scanning.

Access to data in cloud systems or local devices must be protected against access by unauthorized persons by means of password protection.

In the case of manual transfer of data from applicants, the data shall be protected against access by password.

A special IT concept has been developed for the main technical processing platforms qiscout and qimatch, and the protection and security measures have been outlined.

Legal framework

The following laws apply with regard to data protection at MBG:

- General Data Protection Regulation (DSGVO)
- BDSG n.F.
- Data Protection Adjustment and Implementation Act (DSAnpG(E)).

In addition, the following legal bases apply in connection with the data protection laws:

- - Social Security Code (SGB) Fifth Book (V)
- Telecommunications Act
- Telemedia Act (TMG)
- Commercial Code
- Income Tax Act
- Tax code
- Criminal Code

No further industry-specific, legal framework conditions apply