

Privacy Policy and Additional Privacy Information; As of June 30, 2026, Version 1. 4

Information on the Processing of Your Personal Data

1. An Initial Overview

At the time your data is collected, we must inform you in a clear and understandable manner about how we handle your personal data. Here you will find a brief overview, and in the following sections, detailed information about

- who we are as a company and how you can contact us or our data controller; we provide the relevant contact information there;
- the purpose for which we will use your personal data;
- what categories of personal data we process about you;
- the legal basis on which we process your personal data;
- how long we retain your personal data;
- which recipients may receive your personal data;
- whether the personal data will be transferred to a country outside the EU;
- that you have fundamental rights regarding data protection, such as the right to:
 - Access
 - Rectification
 - Erasure
 - Restriction of processing
 - Data portability
 - Objection or
 - detailed information regarding automated decision-making.
- In addition, you will find further information on the handling of data from external and internal applicants,
- on how we handle data in connection with the use of our websites and online presence on social media sites and platforms,
- and regarding the use of cloud services.

Please keep in mind that personal data is necessary for our business operations. Without personal data, we are unable to fulfill your requests, maintain you as a contractual partner, or provide you with information about our activities, services, or our company. Of course, we will

only collect the data necessary for these purposes. Should we request additional data from you, we will inform you of this and indicate that providing such information is voluntary. Incidentally, we do not carry out any automated decision-making processes.

Data protection is of the utmost importance to us. Therefore, we would like to provide you with comprehensive and clear information about how we process your personal data—naturally in compliance with the applicable legal provisions, such as the European General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), and all other relevant data protection regulations. We have defined how we handle personal data in our data protection management system and act in accordance with it.

If you believe that our privacy policy could be improved, we welcome your comments and suggestions.

In addition, you may at any time contact us directly or the competent [data protection supervisory authority](#) (State Commissioner for Data Protection and Freedom of Information of North Rhine-Westphalia, P.O. Box 20 04 44, 40102 Düsseldorf, Phone: 0211/384 24-0, Fax: 0211/384 24-999, Email: poststelle@ldi.nrw.de, <https://www.ldi.nrw.de>) and, if necessary, file a complaint there.

Our Privacy Policy and other information regarding data protection are regularly reviewed and updated as part of our data protection management process. The most current version is published on this page.

2. Detailed Information:

Contact Information for the Data Controller

Eurofins Medical Device Testing Aachen GmbH

Pauwelsstraße 17

52074 Aachen

Phone: +49 (0)241-942618-0

Email: acb-info@mds.eurofinseu.com Website: www.ac-biomed.de

Contact Information for the Data Protection Officer

A Data Protection Officer, as required by law, has been appointed for our company and can be reached as follows:

Dapro Serv GmbH

Ralf Hufschmidt

Auf der Hüls 128

52068 Aachen

Phone: +49 (0) 1522-2569980

DSE Eurofins Medical Device Testing Aachen V1.4

Eurofins Medical Device Testing Aachen GmbH, Pauwelsstr. 17, 52074 Aachen, Germany

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Email: ralf.hufschmidt@daproserv.com

3. Purpose

The specific data we process and the purposes for which we use it depend on the services you use from us. Details regarding the purposes of our data processing can be found in the respective contract documents, forms, consent forms, and other information provided to you in this context. This privacy policy is an integral part of our contract texts, website, or other documents that we provide or have provided to you. Essentially, we process personal data by default for the following purposes:

- Customer and Supplier Management
- Applicant management
- Employee management
- Order management
- Operation of the website www.ac-biomed.de
- Posts on our websites and, where applicable, on social media platforms
- Management of training and event participants

In addition, we process your data in the cases listed below for the purpose of

- sending (by mail, email, etc.) company information, provided you have given us your consent to do so
- communication (analog and digital)
- to obtain information from credit bureaus
- using your email address for marketing purposes, including newsletters, etc., if applicable
- to comply with legal requirements, such as tax laws, mandatory insurance, etc.
- to comply with legal security, monitoring, and reporting obligations
- Archiving data for backup purposes and to fulfill documentation requirements
- disclosure in connection with official or judicial proceedings
- Conducting video conferences

4. Categories

The categories of personal data that we may process from you, depending on your use of our services or the contractual relationship we have with you, are as follows:

- Master data (e.g., name, phone number, email address, mailing address, etc.) from customers (including potential customers), suppliers, and service providers (including potential ones), from employees in the context of the employment relationship, from job applicants, training and event participants, other interested parties, as well as other categories of individuals associated with the aforementioned persons who may be involved in the context of their respective affiliations (e.g., family members, employees of service providers and/or suppliers, etc.)
- Contact information for the aforementioned categories of individuals (addresses, phone numbers, email addresses, etc.)
- Activity data regarding the aforementioned categories of individuals (interests, orders, participation in training sessions and events of all kinds, etc.)
- Bank account information, as well as payment data and, where applicable, creditworthiness
- Usage data on websites and customer portals we offer (IP address, time pages were accessed, pages visited, etc.)
- Consent data, for documenting granted or revoked consents

5. Legal Basis

If you are employed by us, we process your personal data for the establishment, performance, and termination of the associated contractual relationship based on Article 6(1)(b) in conjunction with Article 88 of the GDPR and Section 26 of the BDSG.

If we are in another contractual relationship or are communicating in the context of pre-contractual measures, the processing of personal data is carried out to execute the relevant contracts and to carry out measures and activities within this framework. This processing is based on Article 6(1)(b) of the GDPR.

In addition, we process your data for the purposes listed below on the following legal bases:

- Customer management (Article 6(1)(b) of the GDPR)
- Supplier management (Art. 6(1)(b) GDPR)
- Employee management (Art. 6(1)(c) GDPR)

- Job applicant management (Art. 6(1)(a) and (b) of the GDPR in conjunction with Art. 88 of the GDPR, § 26 of the BDSG)
- Administration (Art. 6(1)(c) GDPR)
- Operation and hosting of the company's websites, in particular to provide you with the requested page content and to ensure the necessary security during their operation (Art. 6(1)(f) GDPR)
- Publication of photos on the company's websites and social media platforms (Art. 6(1)(a) GDPR), provided you have given us your consent
- Market and opinion research (Art. 6(1)(a) GDPR), provided you have given us your consent
- Use of your email address for marketing purposes and, where applicable, newsletters (Art. 6(1)(a) GDPR), provided you have given us your consent
- Compliance with legal requirements, such as tax laws, etc. (Art. 6(1)(c) GDPR)
- Compliance with legal monitoring and reporting obligations (Art. 6(1)(e) GDPR)
- Archiving data for backup purposes (Art. 6(1)(c) and, where applicable, (f) of the GDPR)
- Compliance with documentation requirements (Art. 6(1)(c) GDPR)
- Disclosure in Connection with Regulatory or Judicial Proceedings (Art. 6(1)(e) GDPR)

In the event that we process additional personal data about you based on Article 6(1)(f) of the GDPR—in the context of a balancing of interests—we will inform you of this separately in advance.

6. Retention

We process and store your data only for as long as is necessary for our business activities and purposes, or to the extent required by legal retention obligations (e.g., the German Commercial Code (HGB), the German Fiscal Code (AO), etc.). In individual cases, this may result in personal data being stored for several years.

7. Recipients

As a general rule, your personal data will only be made available to internal or external recipients who require it to fulfill contractual or legal obligations or to perform their duties. This means that data will be transferred or disclosed

- to entities that process data as data processors or jointly with us (e.g., in the areas of HR, legal department, data centers, maintenance, accounting, data disposal, purchasing, customer management, marketing, sales, information and communication technology, website administration and hosting, applicant management, etc.)
- in the case of a legitimate interest, to government agencies, attorneys, associations, courts, experts, credit bureaus, debt collection agencies, etc.
- In the event of a legal obligation, to government agencies, public authorities, social security agencies, etc.
- to other potential third parties, if you have given us your express consent to do so.

Beyond that, we will not disclose your data.

Service providers whom we have commissioned as data processors or under a joint controller arrangement may use the data only for the purposes for which we have disclosed it to them. This is generally governed by contractual agreements with these service providers, and data processing there is subject to the same framework conditions as with us.

8. Data Transfer Outside the EU

Data is generally not transferred to entities in countries outside the European Union (EU) or the European Economic Area (EEA) (so-called third countries). However, when data is collected in connection with visits to our [websites](#), use of our newsletter, use of cloud services, or visits to our social media pages, data transfers to third countries (including non-secure third countries) cannot be ruled out. Please refer to the relevant sections of this Privacy Policy for further information.

9. Data Subject Rights

You may exercise your data protection rights against us under certain conditions:

- You have the right to obtain information about the data we have stored about you in accordance with the provisions of Article 15 of the GDPR—subject to certain restrictions, if applicable.
- If the data we have stored about you is inaccurate or incorrect, you may request that it be rectified in accordance with Article 16 of the GDPR.

- Pursuant to Article 17 of the GDPR, you may request that the personal data stored about you be erased. However, this applies only as long as no other legal provision precludes such erasure.
- If the conditions of Article 18 of the GDPR are met, you may request that the processing of your data be restricted.
- Under certain circumstances, you have the right to request that we provide you with your personal data in accordance with the conditions set forth in Article 20 of the GDPR.
- You have the right at any time to withdraw your consent with future effect in accordance with Article 7(3) of the GDPR. From that point on, your personal data will no longer be processed for the purposes to which you object. The objection may be made informally.

For example, if you have expressly consented pursuant to Article 6(1)(a) of the GDPR, we use your email address to send you our newsletter on a regular basis. You can unsubscribe at any time, for example via a link at the end of each newsletter.

Alternatively, you are welcome to send your request to unsubscribe by email to acb-info@mds.eurofinseu.com at any time.

- Pursuant to Article 77 of the GDPR, you have the right to lodge a complaint with a supervisory authority. As a general rule, you may contact the supervisory authority at your usual place of residence, your place of work, or the location of our company headquarters.
- If your personal data is processed on the basis of legitimate interests pursuant to Article 6(1)(f) of the GDPR, you have the right, pursuant to Article 21 of the GDPR, to object to the processing of your personal data, provided there are grounds for doing so arising from your particular situation or the objection is directed against direct marketing. In the latter case, you have a general right to object, which we will honor without requiring you to specify a particular situation.

If you wish to exercise any of the aforementioned rights, please contact us in writing, if possible, at the address of the data controller provided above (see contact information), or contact us directly via email at acb-info@mds.eurofinseu.com.

10. Additional Information Regarding Data from External and Internal Job Applicants

Personal data relating to you is generally collected directly from you—for example, as part of the application process—pursuant to Article 88 of the GDPR and Section 26(1) of the BDSG.

In addition, we may also have received data from third parties (e.g., job boards such as Indeed, Stepstone, or similar recruitment agencies).

We may also process personal data that we have lawfully obtained from publicly available sources (e.g., professional social networks).

The categories of applicants' personal data that we process include, in particular, your master data (such as first name, last name, additional name elements, nationality, employee ID number), contact information (such as home address, (cell) phone number, email address), and data related to the entire application process (cover letter, resume, employment or other references, proof of qualifications).

If you have voluntarily provided special categories of personal data (such as health data, degree of disability, or religious affiliation) in your cover letter or during the application process, such data will only be processed if you have expressly consented to it (Art. 9(2)(a) GDPR).

We process the personal data of employees and applicants in accordance with and in compliance with the European General Data Protection Regulation (EU GDPR), the German Federal Data Protection Act (, BDSG), and all other relevant provisions of German labor law (e.g., AGG, BetrVG, SGB, etc.).

In this context, the processing of your personal data as part of the application process primarily serves to conduct the application procedure, in particular to determine the extent to which you are suitable for the advertised position. The processing of your applicant data is necessary for a decision regarding the establishment of an employment relationship. The primary legal basis for this is Article 88 of the GDPR in conjunction with Section 26(1) of the BDSG.

10.1 Data Disclosure for Internal and External Applicants:

Within our company, your personal data is shared only with those individuals and departments that need it to make a decision regarding your employment and to fulfill our legal and contractual obligations. Outside our company, we disclose your personal data exclusively to entities that process this data as data processors (applicant management).

Notwithstanding the above, we will only transfer your personal data—for example, to investigative authorities—if we are legally required to do so.

10.2 Retention Period for Internal and External Applicants:

Personal applicant data submitted to us will be deleted as soon as it is no longer required for the purposes mentioned above, at the latest after 6 months. This does not apply if you have expressly consented to a longer retention period, if storage is necessary for evidentiary purposes, or if legal provisions preclude deletion. For example, we retain your applicant data for as long as there is a possibility that you may assert legal claims against us, e.g., due to a violation of provisions of the AGG.

If, on the other hand, your application leads to the establishment of an employment relationship with you, your data will be stored for the purposes of standard administrative and organizational processes and for the performance of the employment relationship until the employment relationship ends.

11. Additional Information on the Collection and Storage of Personal Data When Visiting Our Websites:

When you visit our websites, the browser on your device automatically sends information to the server of our website and our customer portal. This information is temporarily stored in a so-called log file. The following information is collected automatically without any action on your part and stored until it is automatically deleted:

- IP address of the requesting computer,
- Hostname of the requesting computer,
- Date and time of access,
- the website from which the access originated (referrer URL),
- the browser used, its version, and your computer's operating system
- Amount of data transferred

We process the aforementioned data for the following purposes:

- To ensure a smooth connection to the website,
- To ensure a convenient user experience on our website,
- To evaluate system security and stability, as well as
- for other administrative purposes.

The legal basis for data processing is Article 6(1)(f) of the GDPR. Our legitimate interest lies in the operation of our website and the associated presentation of our company. Under no circumstances do we use the collected data to draw conclusions about your identity.

Your data will be deleted as soon as it is no longer needed for the specified purposes, at the latest after 6 months.

11.1 Cookies, Analytics Tools, Plugins, and Other Third-Party Elements

We use cookies on our website. These are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone, etc.) when you visit our website. Cookies do not cause any damage to your device and do not contain viruses, Trojans, or other malware. Cookies are small text files that are stored on your hard drive and associated with the browser you are using, and through which certain information is transmitted to the entity that sets the cookie (in this case, us). Cookies cannot execute programs or transfer viruses to your computer. They serve to make the website more user-friendly and effective overall.

The cookie stores information that is specific to the device you are using. However, this does not mean that we thereby gain direct knowledge of your identity.

Our website uses cookies to the following extent:

- Transient cookies (temporary use)
- Persistent cookies (limited duration)

Transient cookies are automatically deleted as soon as you close your browser. These include, in particular, session cookies. These store a so-called session ID, which allows various requests from your browser to be assigned to the same session. This enables your computer to be recognized when you return to the website.

Persistent cookies are automatically deleted after a specified period, which may vary depending on the cookie. You can delete these cookies at any time in your browser's security settings.

11.1.1 Necessary First-Party Cookies

We use our required first-party cookies, in part, to make your experience with our website more enjoyable. For example, we use so-called session cookies to recognize that you have already visited certain pages on our website. These are automatically deleted when you leave our site.

In addition, to optimize user-friendliness, we also use temporary cookies that are stored on your device for a specific, predetermined period of time. If you visit our site again to use our services, the system automatically recognizes that you have previously visited us and recalls the entries and settings you made, so you do not have to re-enter them. This data is deleted after 6 months at the latest.

We process your data based on our legitimate interest in promoting our company's public image through the website you have accessed and in enhancing user-friendliness. The legal basis for this processing is Article 6(1)(f) of the GDPR.

Most browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or so that a notification always appears before a new cookie is created. Completely disabling cookies, however, may prevent you from using all features of our website.

This stored information is kept separate from any other data transmitted to us. In particular, cookie data is not linked to your other data (e.g., from contact requests or online applications).

11.1.2 Third-Party Cookies, Plugins, and Other Third-Party Elements

We do not use any such cookies, tools, or elements on our site.

12. Online Presence on Social Media Pages and Platforms

We maintain an online presence on the social network and platform LinkedIn to communicate with customers, prospects, and users active there and to inform them about our services. With regard to the operation of this online presence, we are joint controllers with the aforementioned providers.

Please note that this may also involve the processing of user data outside the European Union. This may pose risks to users, as it could, for example, make it more difficult to enforce their rights.

Furthermore, the platform generally processes user data for market research and advertising purposes. For example, usage profiles can be created based on users' behavior and the resulting interests. These user profiles can in turn be used, for example, to display advertisements both on and off the platforms that are presumed to correspond to users' interests. For these purposes, cookies are typically stored on users' computers, in which their usage behavior and interests are recorded. Furthermore, usage profiles may also store " " data regardless of the devices used by users (particularly if users are members of the respective platforms and are logged in to them). We do not have any access to the actual usage data. We use only general usage statistics to assess the effectiveness of usage.

The processing of users' personal data is based on our legitimate interests in effectively informing users and communicating with them in accordance with Article 6(1)(f) of the GDPR.

For a detailed description of the respective processing activities and the options to object (opt-out), please refer to the provider's information linked below.

We also note that requests for information and the exercise of user rights are most effectively addressed directly with the provider. Only the provider has access to user data and can take appropriate measures and provide information directly. If you still need assistance, however, you may contact us.

- LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland) – Privacy Policy: https://de.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy

13. Cloud Services

We use software services accessible via the Internet and run on their providers' servers (so-called "cloud services," also referred to as "Software as a Service"), e.g., "Microsoft Teams," for the following purposes: Sharing documents, content, and information with specific recipients; authenticated and two-factor-secured user logins; as well as chats and participation in audio and video conferences.

In this context, personal data may be processed and stored on the providers' servers to the extent that such data is part of communications with us or is otherwise processed by us as described in this Privacy Policy. This data may include, in particular, users' master data and contact information, as well as data relating to transactions, contracts, other processes, and their contents. The cloud service providers also process usage data and metadata, which they use for security purposes and to optimize their services. In this context, personal data may be transferred to cloud service providers in third countries, such as the United States. The providers we use are certified under the EU-U.S. Data Privacy Agreement, ensuring an adequate level of data protection.

If we use cloud services to provide forms or similar documents and content for other users or on publicly accessible websites, the providers may store cookies on users' devices for web analytics purposes or to remember users' settings (e.g., in the case of media controls).

Notes on Legal Bases: If we request consent for the use of cloud services, the legal basis for the processing is consent pursuant to Art. 6(1)(a) GDPR. Furthermore, their use may be part of our (pre)contractual services pursuant to Article 6(1)(b) of the GDPR, provided that the use of cloud services has been agreed upon in this context. Otherwise, users' data is processed on the basis of our legitimate interests pursuant to Article 6(1)(f) of the GDPR (i.e., our interest in efficient and secure administrative and collaborative processes).

Types of data processed: Master data (e.g., names, addresses), contact data (e.g., email, phone numbers), content data (e.g., text entries, photographs, videos), usage data (e.g., websites visited, interest in content, access times), meta/communication data (e.g., device information, IP addresses).

Data subjects: Customers, employees (e.g., staff members, applicants, former employees), prospective customers, communication partners.

Purposes of processing: Office and organizational procedures.

Legal bases: Consent (Art. 6(1), sentence 1, letter a of the GDPR), performance of a contract and pre-contractual inquiries (Art. 6(1), sentence 1, letter b of the GDPR), legitimate interests (Art. 6(1), first sentence, lit. f GDPR), consent pursuant to Art. 6(1), lit. a GDPR for transfers to servers in the U.S.

Services and service providers used:

Microsoft cloud services: Cloud storage services; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA; Website: microsoft.com/de-de; Security information: www.microsoft.com/de-de/trustcenter .

14. Rights of Use Regarding Legal Notice Information

We expressly object to the use by third parties of the contact information we have published in compliance with our legal notice requirements for the purpose of sending unsolicited advertising and informational materials.

We expressly reserve the right to take legal action in the event of the unsolicited transmission of advertising information, such as via spam emails.

15. Creation

This statement was prepared in collaboration with:

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Auf der Hüls 128 Email: info@daproserv.com

52068 Aachen Website: www.daproserv.com