



**Public Procedure Register
according to Section 4g (2) German Federal Data Protection Act
(Bundesdatenschutzgesetz - BDSG)**

1 Name of the responsible body

Alcedis GmbH

2 Managing board, data processing manager

2.1 Managing board

Mrs. Dr. Elke Heidrich-Lorsbach
Mr. Michael Lorsbach

2.2 Data processing manager

Mr. Tim Herty

3 Address of the responsible body

Alcedis GmbH
Winchesterstraße 3
35394 Gießen
Germany

4 Purpose of data collection, processing or use

As an independent clinical research organisation Alcedis supports medical work groups, hospitals and pharmaceutical companies in implementing projects of clinical research and documentation. Integrative parts are flexible data entry and management systems - adjusted to the needs - for clinical trials and non-interventional studies. Alcedis provides and hosts these systems and also performs reports as ordered by customers.

Alcedis implements clinical trials of phases (I), II-IV according to international standards (ICH, FDA) with focus on oncology.

For medical institutions Alcedis provides an opportunity to contain the increasing cost pressures and the requirement for transparency with effective data management by using the electronic tumour documentation system *Alcedis MED*.

With the help of the tumour documentation system *Alcedis MED*, also online tumour conferences can be arranged.

The purpose of collecting, processing and using personal data consists in customer acquisition, product consulting, processing of customer orders, customer relationship management and product marketing.

Collecting, processing and using personnel data for own purposes occurs only if it is required for the employment relationship and as regulated by law and to fulfil legal obligations.

5 Description of the group of people affected and their data or data categories

5.1 Groups of people

- Employees
- Applicants for employment
- Suppliers
- Customers
- Investigators / physicians and assistance staff
- Interested parties or people

5.2 Data categories

- Personnel data of employees
 - Personnel master data (e.g. name, address, date of birth, bank account, tax class, number of children, religious affiliation, health insurance company)
 - Details of professional qualification such as CV, application documents, testimonials - including training courses for continuing further professional education (training certificates)
 - Dates of joining and leaving the company
 - Data of salary and wage payments
 - Data of pension and social insurance
 - Employment contracts
 - Results of staff appraisals, warning letters, certificates for current professional qualifications
 - Data for personnel administration (working time model, recording of working time, holiday planning, sick notes)
- E-mail correspondence of employees
 - Most of the employees have a specifically e-mail account, who should be used only for business purposes.
 - All e-mail data are archived in an audit-proof manner
- Applicants for employment
 - Contact details
 - Data of the professional career in accordance with the current application procedure (evaluation sheets, protocols of job interview)
- Suppliers
 - Master data maintenance (contact and address data)
 - Offers and contracts

- Delivery notes, invoices
- Calendar management
- Customers / Orderers
 - Master data maintenance (contact and address data)
 - Offers and contracts
 - Invoices
 - Calendar management
 - Web hosting data
 - Data capture for studies/tumour documentation
 - Patient details: name or pseudonym, clinical data, e.g. diagnoses, therapies, lab data according to study protocols
- Investigators / physicians and assistance staff
 - Master data maintenance (contact and address data)
 - Curriculum vitae
 - Details of professional qualification
 - User account data to systems for study data capture
- Interested parties or people
 - Master data maintenance (contact and address data)
 - Calendar management

6 Data recipients

- Social insurance agencies, fiscal authorities
- External service providers
 - File archiving: Friedrich Kurz GmbH, Walter-Zapp-Str. 4, 35578 Wetzlar, Germany
 - Payroll accounting: Tax Chancellery Eric Gerhard, Eiserne Hand 13, 35305 Grünberg, Germany
- Customers / Orderers

7 Time limits for data deletion

- Payroll data: 10 calendar years according to Section 147 German Fiscal Code
- Personnel data: 10 years after leaving the company, if there is no legitimate interest in further storage
 - Warnings: after 2 years, if there is no legitimate interest in further storage
 - Staff appraisals, evaluations: after 2 years, if there is no legitimate

interest in further storage

Sick notes: Usually after 4 years, if there is no legitimate interest in further storage

- Applicant data: Not later than one year after completion of the job application procedure, see Section 15 and 21 of German General Act on Equal Treatment (*Allgemeines Gleichbehandlungsgesetz - AGG*)
- Customer data: The time limits for deletion of customer data (all data, which are recorded and processed in clinical trials) are governed by the legal requirements (Section 42 German Medicinal Products Act [*Arzneimittelgesetz - AMG*], Section 12 German Medical Devices Act [*Medizinproduktegesetz - MPG*], Section 10 German Ordinance on Clinical Trials of Medical Devices [*Verordnung über klinische Prüfungen mit Medizinprodukten - MPKPV*], see Standard Operation Procedure (SOP) GE02-A5: Overview of Archiving Obligations) and generally amount from 10 to 30 years or they are represented by agreed customer requirements.

8 Planned data transmission to third countries

- If customers are located in third countries, personal data are stored and processed using pseudonyms and transmitted to them.