

Subject Matter, Nature, and Purpose of Data Processing

The subject matter, nature, and purpose of data processing depend on the services owed by the processor in accordance with the main contract. The modules listed below and the associated processing activities therefore apply only to the extent that they have been commissioned by the client.

1. Dräger Service for Medical Devices

a) Basics

Dräger Service handles the maintenance (inspection, servicing, and repair) of physical medical devices/equipment. This applies to the various access methods: Direct Access, Service Connect Gateway, or other access methods. In this context, personal data is processed only to the extent necessary for service purposes. In the event of a malfunction or as part of maintenance, this may involve, for example, the measurement results of the affected device; *the so-called service logs* required for this purpose may also contain additional information (e.g., the ideal weight of the affected patient or any relevant pre-existing conditions).

b) Data Categories:

The following categories of personal data are subject to processing:

- Patient data (e.g., master data, measurement results from medical devices, gender, age or age group, weight or ideal weight, pre-existing conditions)
- Employee data (e.g., master data of contacts at the client's premises, such as name, job profile, or contact information, e.g., via email address or phone number)
- Data from the client's cooperation partners (where applicable; this includes, for example, contact details of other contractual partners of the client for coordination purposes)

c) Categories of data subjects:

The following groups of individuals are affected by the processing:

- Patients
- Employees
- Other cooperation partners, if applicable

In all other respects, the provisions of the framework agreement for data processing apply.

2. Dräger Integrated Care Manager (ICM)

a) Overview

The Dräger patient data management system ICM (Integrated Care Manager) is used for treatment planning and documentation in intensive care units in acute care hospitals, as well as for preoperative and intraoperative anesthesia documentation. The scope of services includes the maintenance (inspection, servicing, and repair) of medical devices/equipment (particularly those from Dräger) that transmit data to the Dräger Integrated Care Manager. This applies to the various access methods: Direct Access, Service Connect Gateway, or other access methods. In this context, personal data is processed only to the extent necessary for service purposes. In the event of a malfunction or during maintenance, this may involve, for example, the measurement results of the affected device; *the so-called service logs* required for this purpose may also contain additional information (e.g., the ideal weight of the affected patient or any relevant pre-existing conditions). The data processor receives, to the extent necessary within the scope of system service, at most partial and cursory access to individual data records (excluding the display of real names).

b) Data Categories:

The following categories of personal data are subject to processing:

- Patient data (e.g., master data such as address; “extended master data,” such as measurement results from medical devices, weight, height, gender, age, or age group; medical data such as pre-existing conditions, medication, or treatment and disease progression)
- Employee data (e.g., master data such as the job title of the contact person at the client’s premises, along with name, job profile, or contact information such as email address or phone number; involvement in medical treatment or the documentation of treatment steps performed)
- Data from the client’s cooperation partners (where applicable; this includes, for example, contact details of other contractual partners of the client for coordination purposes)

c) Categories of data subjects:

The following groups of individuals are affected by the processing:

- Patients
- Employees
- Other cooperation partners, if applicable

In all other respects, the provisions of the framework agreement for data processing apply.

3. Dräger Data Analytics

Gas Consumption Analytics / Alarm History Analytics / Lung Protective Ventilation Analytics / Device Utilization Analytics / OR Companion

a) Background

The data processor offers various analytics services that can help the client optimize its processes regarding gas consumption, alarm management, ventilation procedures, and utilization of the device fleet, as well as view device status information at any time. For this purpose, only the relevant data categories—i.e., gas consumption, alarm type, duration, and frequency, as well as ventilation settings, device status, and measurement values—are analyzed, visualized, and used to identify opportunities for improvement.

b) Data Categories:

The following categories of personal data are subject to processing:

- Patient data (device settings, measurement results, or alarm data from medical devices; where applicable, master data such as weight, to the extent relevant for dosing)
- Employee data (indirectly, performance, where, for example, the resolution of an alarm typically falls within the scope of responsibility of an employee, who on average requires *time period X* to do so)

c) Categories of data subjects:

The following groups of individuals are affected by the processing:

- Patients
- Employees

In all other respects, the provisions of the framework agreement for data processing apply.

4. Dräger Silent Care Package

a) Background

The Dräger Targeted Alarm Service enables the coordination of incoming alarms via a central point, which is intended to facilitate the efficient and correctly prioritized handling of alarm messages. In particular, this is intended to counteract an “overload” of alarms at the various intensive care and monitoring beds.

b) Data Categories:

The following categories of personal data are subject to processing:

- Patient data (device settings, alarm data from medical devices)
- Employee data (and, where applicable, performance metrics—for example, since resolving an alarm typically falls within an employee’s area of responsibility and takes an average *of X minutes* to do so)

c) Categories of data subjects:

The following groups of individuals are affected by the processing:

- Patients
- Employees

In all other respects, the provisions of the framework agreement for data processing apply.

5. Dräger Access & Control Package / Mobile Patient Watch / Smart Pilot View

a) Basics

The Access & Control Package enables remote retrieval and display of vital signs and alarms, as well as the configuration of basic device functions of the *Infinity M540* patient monitor, such as alarm limits and audio pause. For this purpose, the *Dräger Core* software solution provides a user interface, and the *M540 Converter Service* acts as a protocol converter between the *Dräger Infinity* and *Service-oriented Device Connectivity* network standards. In this regard as well, the data processor accesses data only to the extent necessary to provide the service.

The *Mobile Patient Watch* module allows patient data to be displayed on mobile devices such as smartphones.

The *Smart Pilot View* module assists in calculating gas consumption and the expected time of patient awakening.

b) Data Categories:

The following categories of personal data are subject to processing:

- Patient data (e.g., master data, address; “extended master data” such as weight or height; measurement results or alarm data)

c) Categories of data subjects:

The following groups of individuals are affected by the processing:

- Patients

In all other respects, the provisions of the framework agreement for data processing apply.

6. Dräger Technical Device Management (TGM)

a) Background

The Dräger TGM business unit is responsible for the management (e.g., specialized inventory and risk management) and maintenance (inspection, servicing, repair) of the client's medical device inventory. In this context, personal data is processed only to the extent necessary for management, maintenance purposes, or within the scope of legally required documentation obligations (e.g., medical device logbook or training documentation in accordance with the Medical Device Operator Ordinance). Third parties, such as the manufacturer, may be involved in the performance of the contract for the aforementioned activities. Certain manufacturers also offer so-called *remote services* that allow direct access to the relevant medical devices.

b) Data Categories:

The following categories of personal data are subject to processing:

- Patient data (e.g., master data, measurement results from medical devices, gender, age or age group, weight or ideal weight, pre-existing conditions)
- Employee data (e.g., master data of contacts at the client's premises, such as name, unique identification number, job profile, or contact details such as email address or phone number)
- Training records (regulatory evidence that users—e.g., nursing staff—have been trained on specific medical devices)
- Contact details of the client's cooperation partners (where applicable; this includes, for example, email addresses or phone numbers of other contractual partners of the client for coordination purposes)

c) Categories of data subjects:

The following groups of individuals are affected by the processing:

- Patients
- Employees
- Other cooperation partners, if applicable

In all other respects, the provisions of the framework agreement for data processing apply.

7. Dräger Companion med

a) Basics

The Dräger Companion med treatment unit consists of the Dräger Companion med app and a breath alcohol monitor, the Dräger Companion 4me. This enables the measurement of breath alcohol regardless of location. By displaying the measurement values and visualizing the course of therapy, the app supports the user's self-monitoring of abstinence. Additionally, the measurement history can be made available to the treating therapist.

b) Data categories:

The following categories of personal data are subject to processing:

- Patient data (e.g., master data such as name, address, and contact information such as email address; measurement results from the breathalyzer)
- Employee data (e.g., basic information about therapists such as name, job profile, contact details such as email address or phone number)

c) Categories of data subjects:

The following groups of people are affected by the processing:

- Patients
- Employees

In all other respects, the provisions of the framework agreement for data processing apply.

8. Network Health Check

a) Background

For hospitals, the protection of patients and patient data is crucial, and risk management is essential when operating networked medical technology. Network congestion, incorrect configurations of medical devices and networks, or unknown devices are threats that can impair the functionality of networked medical devices.

The Network Health Check is an expert service performed on-site at the customer's location that identifies potential risks in the system comprising Dräger devices and software within the customer's network. During this process, the functionality of networked Dräger products and, where applicable, third-party products sourced from Dräger is tested in communication with the network components of the hospital network. In addition, an inventory and compatibility check of the software and hardware in the network are performed. Specific device configurations are reviewed, the network components in use are analyzed, a functional test of designated ward areas is conducted, and a final report outlining potential improvement measures is prepared.

b) Data Categories:

The following categories of personal data are subject to processing:

- Patient data (e.g., master data, measurement results from medical devices, gender, age or age group, weight or ideal weight, pre-existing conditions)
- Employee data (e.g., master data of contacts at the client's premises, such as name, job profile, or contact information, e.g., via email address or phone number)
- Data from the client's cooperation partners (where applicable; this includes, for example, contact details of other contractual partners of the client for coordination purposes)

c) Categories of data subjects:

The following groups of individuals are affected by the processing:

- Patients
- Employees
- Other cooperation partners, if applicable

In all other respects, the provisions of the framework agreement for data processing apply.

9. Medical Module: Dräger Data Analytics – LPV-IC

a) Basics

The Contractor offers an analysis tool that analyzes and visualizes ventilation settings and measured values and identifies potential for improvement in lung-protective ventilation.

LPV-IC is a cloud-based dashboard that displays ventilation parameters in near real time (with a constant internet connection).

The dashboard (scope for 1.0) is designed to provide the current status of every ventilated patient within a unit or department, as well as a comprehensive visualization of the past 24 hours. Using trend indicators within LPV-IC, nursing staff can identify which patient needs to be examined first and receive information on whether a patient has been ventilated in the past according to a specific clinical protocol.

LPV-IC is used as a separate screen in addition to a monitoring center or in the clinician's office. LPV-IC supports shift changes and all healthcare professionals (e.g., CCRNs, intensivists, RTs, physical therapists, or other consultants) involved in or interested in the ventilatory therapy of a specific patient or cohort.

LPV-IC supports the V-Family (V300 / V500 / V600 / V800) as well as Savina 300 and data collection to the cloud via connectivity through the Data Availability Package (CC300 (3.x) / Messaging and Persistence Backbone). With the new V-family (V600 / V800) running software release 3.x, a native SDC device can also be supported.

b) Data Categories:

The following categories of personal data are subject to processing:

- Patient data (device settings, measurement results, or alarm data from medical devices; where applicable, master data such as patient name, height, weight—to the extent relevant to ventilation—and gender)
- Employee data (indirectly, where applicable, performance regarding the course of therapy)

c) Categories of data subjects:

The following groups of individuals are affected by the processing:

- Patients
- Employees

In all other respects, the provisions of the framework agreement for data processing apply.