



80 YEARS: QUALITY
MADE IN GERMANY

Stand 12.02.2026

Data protection information for HEINE Apps

- Rev. 02 -

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German Data Protection Office – www.deutsche-datenschutzkanzlei.de

Preamble

We, HEINE Optotechnik GmbH & Co. KG, are responsible for the HEINE apps (hereinafter “apps”), which we are providing to you. We would like to begin by explaining how and why we collect and use personal data, in a concise, transparent, clear and easily accessible manner and using simple and clear language. You need to be able to access the information at any time. We are therefore obliged to explain which personal data is collected or used. Personal data refers to any information that relates to an identified or identifiable natural person.

We place great importance on the security of your data and compliance with data protection regulations. The collection, processing and use of personal data is subject to the provisions of the currently applicable European and national laws.

Because the protection of your privacy whilst using the apps is important to us, we would like to provide you with the following information to explain which personal data we process when you use the apps and how we handle this data. We will also explain the legal basis for the processing of your data and tell you about our legitimate interests, if we process your data to protect our legitimate interests.

You can access this data protection information at any time via the “Data protection” heading in the app’s menu.

This data protection information aims to explain how we handle your personal data and how you can contact us.

Contact details of the responsible party

HEINE Optotechnik GmbH & Co. KG

Dornierstr. 6

82205 Gilching

Germany

Tel.: +49 8105 7728 0

Commercial register no.: HRA 52039

Managing directors: Oliver Heine, Timo Martin

E-mail: [info\(at\)heine.com](mailto:info(at)heine.com)



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You can contact our data protection officer at the following address:

Sven Lenz
German Data Protection Office – Datenschutzkanzlei Lenz GmbH & Co. KG
Bahnhofstraße 50
87435 Kempten
Germany
E-mail: dsb@heine.com

1. Information on processing your data

HEINE offers medical devices for primary diagnostics, e.g. dermatoscopes, as well as apps that implement digital functions for examining patients. Apps are either an integral part of the device (integrated app) or run on a mobile device (e.g. smartphone, tablet) (companion app).

Integrated HEINE App

On HEINE medical devices that can be used without another mobile device, the corresponding app is already pre-installed by the manufacturer as part of the device. The app is used to capture images and store your data on the medical device or in the HEINE DERManager.

Companion HEINE App

If the HEINE device is used in combination with a mobile device (e.g. a smartphone), HEINE offers an accompanying app for download that provides the user interface. The app is used to capture images and store your data on the mobile device or in the HEINE DERManager.

HEINE DERManager

Some apps support the connection to the HEINE DERManager. This must be additionally booked by the customer. If this is the case, the images created are transferred to a DERManager server. The DERManager server is operated by HEINE as a cloud service. The apps also offer the option of retrieving patient data from the server, assigning images to a person and uploading data for documentation purposes.

Regardless of use, the companion app stores the data on the mobile device. If the app is deleted, the data is also deleted from the mobile device. When using a HEINE medical device with an integrated app, the data can also be completely deleted from the device, e.g. by resetting the device to its factory settings.

Bestimmte Informationen werden bereits automatisch verarbeitet, sobald Sie eine App verwenden. Welche personenbezogenen Daten genau verarbeitet werden, haben wir im Folgenden für Sie aufgeführt:



1.1 Information gathered at the time of download

If the companion app is downloaded via an app store selected by you, certain required information will be communicated to the app store, in particular the first and last name, the e-mail address, the device ID (app-scoped) and the time of the download may be processed. This data is processed exclusively by the respective app store and is beyond our control. By using the app store, you have consented to its terms of use. The respective provider will inform you about the processing of your data through the use of the app store.

1.2 Information gathered automatically

As part of your use of the apps, we collect certain necessary data automatically. For the provision of updates or when the DERManager connection is active, these are

- IP address
- Name and version of the user agent
- Logging data
- Time of access

This data is communicated to us automatically, though not stored,

- (1) to provide you with the service and its associated functions,
- (2) to improve the app's functions and features and
- (3) to prevent improper use and resolve faults.

This data processing is justified

- (1) because processing is required to fulfil the contract for the use of the app between you as the data subject and ourselves in accordance with Art. 6 para. 1b) GDPR, and
- (2) because we have a legitimate interest in ensuring the functionality and fault-free operation of the app and in being able to provide a service in line with the market and interests, which in this case outweighs your rights and interests in the protection of your personal data, according to Art. 6, para. 1f) GDPR.

Matomo

HEINE uses the web analysis service of InnoCraft Ltd., 150 Willis St, 6011 Wellington, New Zealand ("Matomo"). In some of the apps, this service may be activated to ensure the optimization of the app.

Matomo uses a so-called "config_id" to enable various analyzes of site usage within a short time window of up to 24 hours. The "config_id" is a randomly set, time-limited hash of a limited set of the user's settings and attributes. The config_id or config hash is a string calculated for a user based on their operating system, browser, browser plugins, IP address and browser language. Matomo does not use device fingerprinting and uses an anonymized IP address of the app user to create the "config_id".

If the information processed in this way includes personal user data, the processing takes place in accordance with Article 6 Paragraph 1 Letter f of the GDPR on the basis of our



legitimate interest in the statistical analysis of user behavior for optimization and marketing purposes. In order to object to data processing of your visitor data in the future, we provide you with a separate option to object on our website.

If data collected using Matomo technology (including your pseudonymized IP address) is transferred to Matomo servers in New Zealand and processed for usage analysis purposes, we would like to inform you that the European Commission has issued a so-called adequacy decision for New Zealand, which ensures compliance with European regulations Data protection standards for international data transfers attested.

1.3 Creating a user account (registration) and login

In order to use the DERManager integration, a registration is required. Access data is provided by HEINE Optotechnik and stored locally and on the server. This involves processing the following data:

- server ID
- user name
- password

We use the information that you give us to authenticate you.

This data processing is justified

- (1) because processing is required to fulfil the contract for the use of the app between you as the data subject and ourselves in accordance with Art. 6 para. 1b) GDPR, and
- (2) because we have a legitimate interest in ensuring the functionality and fault-free operation of the app and in being able to provide a service in line with the market and interests, which in this case outweighs your rights and interests in the protection of your personal data, according to Art. 6, para. 1f) GDPR.

1.4 Using the App

Within the app, you can enter, manage and edit various information, tasks and activities. In particular, this information includes the following:

- Transferring images to HEINE DERManager

The use of the companion app on a mobile device (such as a smartphone) also requires the following authorizations:

- Camera access to be able to take images;
- Photo library access to be able to import images from the photo library;
- Network access to be able to connect to a server in the local network;
- Internet access to be able to connect to a server operated by HEINE.

Usage data is processed and used to provide the service. This data processing is justified because processing is required to fulfil the contract for the use of the app between you as the data subject and ourselves in accordance with Art. 6 para. 1b) GDPR.



2. Forwarding and transmission of data

Except in cases explicitly described in this data protection information, your personal data will only be forwarded without your express prior consent where permitted or required by law. This may be the case, for example, if processing is required to protect the essential interests of the user or another natural person.

- 2.1.** We forward your personal data to the following external service providers:
- there is currently no intention to forward data to external service providers

Any potential forwarding of personal data is justified by the fact that we, as the order processor, have – pursuant to Art. 28 para. 1 GDPR – carefully selected and regularly inspected our external companies and external service providers, and have established a contractual obligation with these providers to process all personal data in accordance with our instructions.

- 2.2.** If necessary to explain the unlawful use or misuse of the app or for the purposes of prosecution, personal data will be forwarded to the law enforcement authorities or other authorities and, if necessary, to injured third parties or legal advisers. However, this action will only be taken if there is evidence of unlawful use and/or misuse. Data may also be forwarded if it supports the enforcement of terms of use or other legal claims. We are also legally obliged to issue information to specific public authorities on request. These include law enforcement authorities, authorities prosecuting administrative offences entailing a fine, and the finance authorities.

Any potential forwarding of personal data is justified on the grounds that

- (1) processing is necessary to fulfil a legal obligation incumbent upon us according to Art. 6 para. 1f) GDPR in combination with the national legal provisions on the forwarding of data to law enforcement authorities, or
- (2) we have a legitimate interest in forwarding the data to the specified third parties where there are indications of misuse or for the enforcement of our terms of use, other terms or for legal claims, and your rights and interests for the protection of your personal data do not outweigh these interests according to Art. 6 para. 1f) GDPR.

- 2.3.** As part of the advancement of our business, the structure of our organisation may change as a result of a change to its legal form, or as a result of subsidiaries, divisions or other elements being founded, acquired or sold. With these transactions, your information will be forwarded as required with the part of the organisation that is being transferred. Where any personal data is forwarded to third parties in the manner described above, we will ensure that this is done in accordance with this data protection information and the applicable data protection legislation.

Any potential forwarding of personal data is justified on the grounds that we have a legitimate interest in modifying our business format as necessary in line with economic and legal requirements, and that your rights and interests for the protection



of your personal data do not outweigh these interests according to Art. 6 para. 1f) GDPR.

3. Data transmission to third countries

We process data solely in the states of the European Economic Area (“**EEA**”); no data is transmitted to third countries.

In the event that the client is a contractual partner not from the EEA (e.g. Australia) and is using the DERManager cloud-based solution, data is retrieved from servers in the EU using the DERManager app. Data is then transmitted to a third country from the point of view of the EDSA. However, in this case, the SCCs that apply in each case are concluded as appropriate safeguards.

4. Changes in purpose

Your personal data is only processed for anything other than the purposes detailed if permitted by legislation or if you have given your consent for data processing for the change in purpose. If further data is processed for purposes other than those for which the data was originally gathered, we will inform you of this further processing for these other purposes and provide you with all the relevant information in this regard.

5. Data retention period

We abide by the principles of data economy and data avoidance. This means that we only retain the data you have provided to us for as long as it is required to fulfil the aforementioned purpose or for the various retention periods specified by the legislator. As a rule, we retain your personal data for the duration of use or contractual relationship for the app. The images are stored in a secure area on the mobile device. It is always possible to remove the data, e.g. by deleting the apps or resetting to the factory settings.

Specific details in this data protection information or legal provisions on the retention and deletion of personal data, particularly data that we are required to retain for tax reasons, remain unaffected.

6. Your rights as the data subject

6.1 Right to information

You have the right to obtain information regarding your stored data free of charge. At your request and in accordance with current legislation, we will provide written details of the personal data we are storing about you. This also includes the source and recipients of your data and the purpose of data processing. Please refer to the contact addresses given for this purpose.



6.2 Right to correction of inaccurate data

You have the right to request the correction of any incorrect data we are holding about you. In so doing, you can request a restriction of processing, e.g. when contesting the accuracy of your personal data. Please refer to the contact address provided for this purpose

6.3 Right to deletion

Similarly, you can request deletion of your personal data, provided there are no statutory retention obligations. If such an obligation exists, we will block your data on request. If the relevant legal obligation exists, we will also delete your personal data without you making a corresponding request. Please refer to the contact address provided for this purpose.

6.4 Right to restriction of processing

In accordance with Art. 18 GDPR, you have the right to ask us to restrict the processing of your data. In particular, this right exists if there is any dispute with regard to the accuracy of the personal data between the user and ourselves, for the period that requires checking for accuracy and, where there is an existing right to deletion, if the user requests restricted processing instead of deletion; this right also exists if we no longer require the data for the agreed purposes, but the user requires this for the establishment, exercise or defence of legal claims or if the successful resolution of a conflict between us the user remains in dispute. To exercise the right to restriction of processing, please refer to the contact addresses provided for this purpose.

6.5 Right to data portability

You have the right to obtain the personal data about you, that you have provided to us, in a structured, conventional, machine-readable format according to Art. 20 GDPR. To exercise the right to data portability, please refer to the contact addresses provided for this purpose.

6.6 Right of appeal to a supervisory authority

You have the option to submit an appeal to one of the data protection supervisory authorities.

Bavarian State Office for Data Protection Supervision (BayLDA)
Promenade 27, 91522 Ansbach, Germany
Telephone: +49 981 53-1300
Fax: +49 981 53-981300

The form for appeals to the Bavarian State Office for Data Protection Supervision can be opened by following this link:
<https://www.lida.bayern.de/de/beschwerde.html>



7. Right of revocation

You have the option, at any time, to revoke your consent to the use of your data for internal purposes with effect for the future. To do this, simply send an e-mail expressing your wishes to dsb@HEINE.com. However, this type of revocation does not affect the legitimacy of the processing procedures undertaken by us prior to the submission of your request. Revocation does not affect data processing for any other legal purpose such as, for example, contract initiation (see above).

8. Protection of your personal data

We implement contractual, organisational and technical security measures using the best-available technology to ensure compliance with the provisions of data protection legislation and to protect the data processed by us against accidental or intentional manipulation, loss, destruction or access by unauthorised persons.

In particular, security measures include the encrypted transmission of data between your browser and our server. 4096-bit RSA encryption technology is used for this purpose.

9. Protection of minors

Persons under the age of 16 may only provide us with their personal information if their parent or guardian has given their express consent. This data is processed according to this data protection information.

10. Contact

If you have any questions or comments on how we handle your personal data or if you, as the data subject, wish to exercise the rights specified in sections 6 and 7, please refer to the contact data specified in section 1 of this data protection information.

11. Changes to our data protection information

We reserve the right to modify our data protection information from time to time to ensure that it complies with current legal requirements at all times, or to reflect changes to our services in the data protection information. This could include, for example, the introduction of new services. When you continue to use the app, the new data protection information will then apply. You can access the current version of the data protection information at any time under the “Data protection” heading in the app.

12. Brand protection

Any company or brand name mentioned in this information is the property of the respective company. Brands and names are mentioned purely for information purposes.