

Privacy Policy for foot measurement for orthopaedic insoles and custom shoe modifications

We take the protection of your personal data very seriously. We process your data in accordance with applicable data protection laws, in particular the EU General Data Protection Regulation (EU GDPR) and the country-specific implementing laws that apply to us. This privacy policy provides you with comprehensive information about the processing of your personal data by UVEX ARBEITSSCHUTZ GMBH and the rights to which you are entitled.

Personal data is information that enables the identification of a natural person. This includes, in particular, your name, date of birth, address, telephone number, email address and your IP address.

Data is considered anonymous if no personal connection to the user can be established.

This Privacy Policy applies to the measurement of your feet and the subsequent manufacturing of custom-made orthopaedic insoles or shoe modifications. Depending on the project, data is collected either directly by UVEX ARBEITSSCHUTZ GMBH, your employer or by system partners commissioned by your employer, who then forward the data to us.

Data controller and data protection officer

UVEX ARBEITSSCHUTZ GMBH

Würzburger Straße 181–189

90766 Fürth

<https://www.uvex-safety.com>

Telephone 0911 / 97 36

Email: safety@uvex.de

Data Protection Contact: datenschutz@uvex.de

Your rights as a data subject

Firstly, we would like to take this opportunity to inform you of your rights as a data subject. These rights are defined in Art. 15 - 22 EU GDPR. These include:

- The right of access (Article 15 of the EU GDPR),
- The right to erasure (Article 17 of the EU GDPR),
- The right to rectification (Article 16 of the EU GDPR),
- The right to data portability (Article 20 of the EU GDPR),
- The right to restriction of processing (Article 18 of the EU GDPR),
- The right to object to data processing (Article 21 of the EU GDPR).

To exercise these rights, please contact: datenschutz@uvex.de.

The same applies if you have any questions regarding data processing within our organisation or wish to withdraw your consent. You also have the right to lodge a complaint with a data protection supervisory authority.

Purposes and legal bases for processing

We process your personal data in order to provide a recommendation for shoe models in the appropriate size and width based on the measurement of your foot length, width and arch, and to carry out the manufacturing processes required for orthopaedic insoles or shoe modifications. This may be done digitally or manually. The processing takes place in connection with the contractual commission placed with UVEX ARBEITSSCHUTZ GMBH by your employer for the manufacture of custom-made products.

The processing of your personal data is based exclusively on the consent you have given to your employer. The legal basis is Article 6(1)(a) of the GDPR and Article 9(2)(a) of the GDPR, insofar as special categories of personal data are concerned.

Recipients of the data / Categories of recipients

The data is collected either (a) directly by UVEX ARBEITSSCHUTZ GMBH as part of a survey (digital or analogue), (b) by your employer, or (c) by system partners.

Where data is collected by your employer or system partners, this data collection is carried out under their own responsibility. This privacy policy applies exclusively to our processing of personal data to the extent that data is transmitted to us by your employer or a system partner (Art. 14 GDPR).

For digital foot measurement, we use the **SECOSOL® app** as well as the corresponding pressure measurement plates from Matthias Hartmann Orthopädie + Sport GmbH, Auf der Langaar 9, 35684 Dillenburg. The developer and provider of the web app is Footprint Technologies GmbH, Alt-Stralau 5 B, 10245 Berlin.

The measurement results and the resulting product recommendation are transmitted by Footprint Technologies to uvex without any personal identification. For the manufacture of custom-made orthopedic insoles, the necessary data – such as the dynamic pressure measurement and the medical history form from Matthias Hartmann Orthopädie + Sport GmbH – are additionally transmitted by Footprint Technologies in pseudonymized form.

At this stage, it is only uvex that can establish a link to a specific individual via a randomly generated reference number assigned to that person.

If an analogue foot measurement is carried out instead of a digital one, your data will initially remain with UVEX ARBEITSSCHUTZ GMBH.

We then forward your data to our manufacturing partners. We take care to use only reliable manufacturing partners – your data is processed within the EU and by a manufacturing partner in Switzerland. The European Commission has determined that Switzerland offers an adequate level of data protection. We enter into the contracts required under data protection law with our manufacturing partners.

Transfers to third countries / Intended transfers to third countries

We process your data within the European Union.

Should processing outside the European Union be necessary, we ensure that appropriate safeguards are in place in accordance with Article 44 et seq. of the EU GDPR.

Data retention period

UVEX ARBEITSSCHUTZ GMBH generally stores personal data only to the extent and for as long as is necessary to carry out the measurement and forward the data to our manufacturing partners.

Please note that the personal data required for the manufacture of orthopaedic insoles or shoe modifications will subsequently be processed by the manufacturing partners we use and, where necessary, also stored there.

The retention period at these manufacturing partners depends on the respective processing purposes. This may be the case in particular if an order is placed following the measurement and statutory retention obligations (e.g. under commercial or tax law) require the data to be stored for a longer period.

Provided there are no further retention obligations, the data will be routinely deleted once the purpose has been fulfilled.

In addition, data may be retained if this is necessary to assert, exercise or defend legal claims; in this case, the data is retained within the statutory limitation periods.

Categories, sources and origin of the data

When digitally measuring your feet, we process the following data:

- 4 images of the right and left foot
- Metadata from the images, e.g. timestamps, resolution and other technical parameters
- Analysis data from the foot measurement and the corresponding size recommendation
- Calculated foot lengths and widths
- Session ID
- Dynamic pressure measurement on the right and left
- Medical history form

This data is linked to you via a reference number; the link between this number, your name and other details from the order form is known exclusively to UVEX ARBEITSSCHUTZ GMBH, your employer and the relevant manufacturing partner involved in the production process.

When measuring your feet using the analogue footprint, we process

- Footprint
- Prescription, if available and provided
- Diagnosis, if available and provided

When measuring your feet using impression foam, we process

- Footprint
- Prescription, if available and provided
- Diagnosis, if available and provided

This data is linked to you via the order form, which is known exclusively to UVEX ARBEITSSCHUTZ GMBH, your employer and the relevant manufacturing partner for the production process.

The data mentioned may constitute health data within the meaning of Article 9 of the GDPR, as it is possible to draw conclusions about physical characteristics and orthopaedic requirements.

Automated individual decision-making

We do not use purely automated processing procedures to reach a decision.