

Data Protection Statement Patient Treatment

University Clinic of Dentistry
hereinafter referred to as "UZK"

1. Data Controller

Universitätszahnklinik Wien GmbH

Sensengasse 2a, 1090 Wien, Österreich

E-Mail: office-unizahnklinik@meduniwien.ac.at | Web: <https://www.unizahnklinik-wien.at/>

Data protection officer:

VACE Systemtechnik GmbH, E-Mail: datenschutz-unizahnklinik@meduniwien.ac.at.

2. Purpose of Data Processing, Data Categories und legal basis

UZK processes personal data of patients exclusively for the purpose of medical care and administration within dental treatment. This includes in particular:

a) Processing Purposes

- Diagnosis and treatment of oral and maxillofacial diseases
- Fulfilment of statutory documentation duties (medical record keeping)
- Billing of services to patients themselves or to insurance bodies (statutory health insurance or private insurers)

b) Data Categories

- Master data: Name, title, date of birth, gender, nationality
- Contact data: Address, e-mail address
- Social insurance data: e.g. social insurance number
- Treatment data: Anamneses, findings, diagnoses, therapies, medications, x-ray/CT images, lab results, medical letters
- Billing data: Insurance information, service documentation, fees, payment information

c) Legal Basis

- Treatment contract – Art. 6 para. 1 lit. b GDPR
- Fulfilment of a legal obligation – Art. 6 para. 1 lit. c GDPR
- Public task (university teaching) – Art. 6 para. 1 lit. e GDPR
- Vital interests – Art. 6 para. 1 lit. d GDPR
- Consent – Art. 6 para. 1 lit. a GDPR, Art. 9 para. 2 lit. a GDPR
- Statutory retention duties – Treatment data up to 30 years (§ 1489 ABGB), billing data at least 7 years (§ 132 BAO)

3. Recipients of Data

Your data will only be made available within the UZK to those departments that need it to fulfill the above-mentioned purposes (e.g., treating physicians, assistant staff, billing department, etc.).

In addition, the UZK will only transfer your personal data to external parties in the following cases:

- Social security institutions and departments involved in billing:

The data required for billing the services provided (e.g., name, social security number, date of treatment, services provided) will be transferred to your statutory health insurance fund or private insurance company.

- **External healthcare providers:**
Findings or medical records will only be passed on to co-treating physicians or external healthcare facilities (e.g., referrals to specialists, hospitals) will only be passed on with your consent or at your initiative. In urgent cases of further treatment—such as referrals—data will be passed on either on the basis of your (implied) consent or, if vital, on the above-mentioned legal basis.
- **Laboratories:**
The UZK uses external laboratories for certain diagnostic analyses (e.g., blood tests, tissue samples). For this purpose, samples and the necessary personal data (such as sample codes, gender, date of birth for interpreting findings) are transmitted to the respective contract laboratory. The laboratories are subject to strict data protection regulations.
- **Authorities and public bodies:**
In the event of existing legal reporting obligations or requests for information, UZK transmits data to the competent authorities. Examples: Reporting certain infectious diseases to the health department in accordance with the Epidemic Act; providing information to courts or law enforcement authorities on the basis of the relevant legal provisions.
- **Legal representatives:**
If patients are not of legal age or legally competent (e.g., minor patients), relevant data will also be disclosed to legal guardians or guardians ad litem to the extent necessary for decision-making and consent to treatment.

All external recipients are only entrusted with your data to the extent required for the respective purpose and in compliance with confidentiality requirements. No further disclosure to third parties (e.g., for advertising purposes) will take place unless you have expressly consented to this or the UZK is obliged to do so by law.

4. Third Country Transfer

Your personal data will not be transferred to countries outside the EU/EEA or to international organizations. Processing takes place within Austria/the EU, where a high level of data protection is guaranteed. If, in individual cases, it is necessary to transfer data to a third country (e.g., at your express request or within the scope of specific consent), this will only be done under the strict conditions of Art. 44 ff. GDPR (e.g., if there is an adequacy decision by the EU Commission or by concluding standard data protection clauses). We would inform you in advance of any details of an intended transfer to a third country and, if necessary, request your consent.

5. Storage Duration

Personal data will be deleted as soon as the purpose for which it was originally collected has been fulfilled and there are no legal retention periods preventing its deletion. UZK generally retains medical record data for up to 30 years from the last entry. This extended retention period serves the purposes of medical follow-up care and the defense against any legal claims.

6. Automated Decision Making

No automated decision-making or profiling in accordance with Art. 22 GDPR takes place.

7. Rights of Data Subjects

Data security is also a high priority with regard to the rights of data subjects. Therefore, data subjects can only assert their rights after they have been unequivocally identified.

Every data subject whose personal data is processed by UZK has the following rights:

- Right of access (Art. 15 GDPR): You can request information about whether and which personal data we process about you.
- Right to rectification (Art. 16 GDPR): You have the right to have incorrect or incomplete personal data corrected.
- Right to erasure (Art. 17 GDPR): You can request the deletion of your personal data, provided that no legal retention obligations stand in the way.
- Right to restriction of processing (Art. 18 GDPR): You can request that your data only be processed to a limited extent, e.g. during an examination of your objections.
- Right to data portability (Art. 20 GDPR): You have the right to receive your provided data in a structured, common format or to have it transferred to another controller.
- Right to object (Art. 21 GDPR): You can object to the processing of your data for reasons arising from your particular situation.
- Withdrawal of consent (Art. 7 para. 3 GDPR): You can withdraw consent given at any time with effect for the future.

To exercise your rights, you can contact us in writing by post or by e-mail (datenschutz-unizahnklinik@meduniwien.ac.at) at any time or visit us personally.

8. Technical and Organizational Measures

UZK implements appropriate technical and organizational measures according to Art. 32 GDPR to protect personal data against loss, misuse and unauthorized access (access restrictions, encryption, training, data minimisation, regular security reviews, secure data transmission).

These include:

- Access restrictions (restricted access to personal data)
- Encryption (secure storage and transmission of data)
- Regular data protection training for employees
- Data minimization (only as much data as necessary is collected and processed)
- Regular security checks of systems and processes
- Secure data transmission in electronic communication (e.g., in data exchange with MedUni Vienna)

All UZK employees are contractually bound to confidentiality and are regularly instructed and trained in the secure handling of personal and other critical data.

9. Continuous Control and Improvement

Continuous improvement of quality and processes is a top priority at UZK. Compliance with data protection guidelines and applicable laws, as well as the effectiveness of data protection and data

security measures, are continuously monitored and optimized to ensure the smooth implementation of data protection measures.

10. Right to Lodge a Complaint

You have the right to lodge a complaint with the Austrian Data Protection Authority, Barichgasse 40-42, 1030 Vienna, dsb@dsb.gv.at.