WHO WE ARE

The Ergonomics Factory Group ("EFTY Group") comprises two legally independent entities:

1. **Ergonomics Factory Sàrl** ("EFTY"), Rue du Voisinand 8, CH-1095 Lutry, Switzerland. Managing Director: Dr. Andreas BAIER. UID: CHE-285.744.392
2. **KDA User and Market Research GmbH** ("KDA"), Bruchstrasse 5, 60594 Frankfurt am Main, Germany. Managing Director: Thomas JAHNKE. HRB 39686. VAT ID: DE 811842866

The EFTY Group is a collective umbrella brand without its own legal personality. The data controller for any project is the entity named in the applicable contract or SOW.

Your contact to our Data Protection Officer: dpo@efty.group

SCOPE AND APPLICABILITY

This policy applies to all individuals and organisations whose personal data the EFTY Group processes, worldwide. It is structured by audience:

Section	Audience
A	Study participants, patients & healthcare professionals
B	Website visitors & newsletter subscribers
C	Business clients (B2B)

LEGAL FRAMEWORK

KDA User and Market Research GmbH is established in Germany and is subject to GDPR and BDSG as an EU entity. GDPR applies in full to all KDA data processing, irrespective of where data subjects are located.

Ergonomics Factory Sàrl is established in Switzerland and is subject to the Swiss revDSG. Switzerland holds EU adequacy status, meaning GDPR-equivalent standards apply throughout.

If data processing affects other countries, we apply the corresponding local requirements in addition to GDPR or revDSG and, in case of doubt, always the stricter protection of the data.

OUR PRINCIPLES

For us, data protection is not a compulsory exercise, but a promise. We adhere to the following principles:

- We only collect what we really need. We only ask for data that is necessary for the respective purpose.
- We are transparent. We clearly explain why we collect data and what happens to it.
- We protect your data. We use modern security technologies and train our employees regularly.
- We stick to the rules. We work in accordance with the GDPR, the BDSG, the Swiss Data Protection Act (revDSG), ISO 20252 as well as the Code of Conduct of the ADM, BVM, DGOF and the EphMRA Code of Conduct.

LEGAL BASIS

Legal Basis	Application
GDPR Art. 6(1)(a)	Consent
GDPR Art. 6(1)(b)	Contract performance
GDPR Art. 6(1)(c)	Legal obligation
GDPR Art. 6(1)(f)	Legitimate interest
GDPR Art. 9(2)(a)	Health & special category data — explicit consent
GDPR Art. 9(2)(j)	Scientific research
§ 22 BDSG	Health data processing (Germany)
§ 27 BDSG	Research privilege (Germany)
Swiss revDSG Art. 31	Overriding interest / research (Switzerland)

SECTION A — STUDY PARTICIPANTS, PATIENTS & HEALTHCARE PROFESSIONALS

Who This Covers

This section applies to all individuals participating in EFTY Group studies, evaluations, interviews or surveys, including:

- Patients and patient advocacy group members
- Healthcare professionals (HCPs) — physicians, nurses, pharmacists, surgeons, device operators, lab technicians and other clinical users
- Lay users and caregivers in usability and human factors studies
- Participants in market, opinion and social research
- Product evaluation testers

Data We Collect

Depending on the study, we collect different data:

From all participants:

- Demographic information (age, gender, profession, relevant experience)
- Behavioural data (interaction patterns, task performance, use errors)
- Opinions, ratings and open-ended responses
- Video and audio recordings — only with explicit prior consent
- Eyetracking-Data

From patients additionally:

- Health information — only where directly relevant to the study
- Diagnosis or condition data — only with explicit consent

From healthcare professionals additionally:

- Professional credentials, specialty and clinical role
- Institutional affiliation
- Clinical experience with the relevant product type or therapy area
- Prescribing or usage patterns — only where relevant to the study scope
- Professional opinions on usability, safety or clinical utility

HCP data collected in a purely professional context is processed under legitimate interest (GDPR Art. 6(1)(f)). Where health-related data is involved, explicit consent (GDPR Art. 9(2)(a)) is required.

Purpose

All data is collected solely to conduct the study the participant is engaged in. It is never used for advertising, sales, direct marketing or any purpose unrelated to the research. This is a binding obligation under ISO 20252 and the EphMRA Code of Conduct.

Legal Bases

Participant Type	Legal Basis
General participants	Consent — GDPR § 6.1 a
Patients — health data	Explicit consent — GDPR § 9.2a
Scientific research	GDPR Art. 89 + § 27 BDSG
HCPs — professional data	Legitimate interest — GDPR Art. § 6.1 f
HCPs — health-related data	Explicit consent — GDPR § 9.2a

Pre-Study Information

Before participating, every individual receives:

- A detailed explanation of the study
- Clear information regarding which data is collected and why
- A consent form for you to sign or confirm digitally
- A notice stating that your participation is voluntary and that you can withdraw at any time

HCPs additionally receive:

- A description of the professional data being collected and its specific purpose
- Disclosure of any study sponsor or third-party involvement
- Confirmation of how professional identity is protected in published outputs

Privacy Protections

- Data is pseudonymised as soon as practicable after collection
- No participant name appears in published results, reports or regulatory documents
- Full anonymisation is available on request; once applied, re-identification is not possible
- HCP professional identity is protected in all outputs unless explicit attribution consent has been given

Retention

Data Type	Retention Period
Raw study data	Up to 1 year after study completion
Anonymised research data	Up to 5 years
HCP professional data	Up to 3 years after last project interaction
Regulatory data (MDR/FDA)	Up to 15 years

Patient Studies — Additional Rules

If you participate in a study as a patient, the following additional rules apply:

- Conducted only following an ethical review
- Patient data is never shared with sponsors or manufacturers
- All staff conducting patient studies receive specialist training
- Study protocols are available on request
- The EphMRA Code of Conduct is observed throughout

Healthcare Professional Studies — Additional Rules

- HCPs must hold qualifications appropriate to the study subject matter
- No study may be used as a pretext for promotional activity
- HCPs are informed whether a study is industry-sponsored
- Honoraria and incentives are lawful, proportionate and transparently disclosed
- HCP data is never passed to a sponsor in identifiable form without explicit consent
- All HCP data handling respects applicable professional confidentiality obligations

Vulnerable Participants

Additional safeguards apply to:

- Minors (under 18)
- People with cognitive or mental health conditions
- Elderly or frail individuals
- People in dependency relationships or acute illness situations

Measures include guardian or parent consent for minors, prior ethics committee review, study designs that minimise burden or distress, the unconditional right to pause or withdraw, and enhanced anonymisation.

SECTION B — WEBSITE VISITORS & NEWSLETTER SUBSCRIBERS

Who is affected?

All individuals who visit our websites or use our digital services.

Automatically Collected Data

When you visit www.efty.group, we collect technically necessary data:

- anonymised IP address,
- device and browser information,
- pages visited, buttons clicks, and duration of visit.

This is used solely to operate and improve the website.

Contact Enquiries

When you contact us via form or email, we collect

- your name,
- email address
- and message

used solely to respond to your enquiry and deleted once the purpose is fulfilled or upon request.

Legal basis: Consent or performance of a contract (GDPR § 6(1)(a)/(b))

Newsletter

Subscription requires explicit opt-in. We collect your email address, your first and last name, and, where applicable, the name of your company/organisation. You may unsubscribe at any time via the link in every email or by contacting unsubscribe@efty.group. Subscriber data is deleted promptly upon unsubscription. We do not share your address with third parties for any marketing purpose. Legal basis: Consent (Art. 6 § 1 lit. a GDPR).

Cookies

We distinguish between:

Type	Description	Consent Required
Necessary	Required for website function	No
Analytical	Usage statistics to improve the site	Yes
Marketing	Personalised content or advertising	Yes

Analytical and marketing cookies are only active with your explicit consent, adjustable via our cookie settings.

Legal Bases

- Technically necessary data: Legitimate interest (GDPR § 6.1f)
- Contact forms: Consent or performance of contract
- Cookies: Consent (except necessary)

Retention

We will delete your data as soon as the purpose has been fulfilled - or at your request.

SECTION C — BUSINESS CLIENTS (B2B)

Data We Collect

- Contact details of client representatives (name, email, phone, title/role)
- Communication records (emails, meeting notes)
- Contract and invoicing data
- Project data as defined in the SOW

Purpose & Legal Basis

Purpose	Legal Basis
Service delivery	Contract performance — GDPR Art. 6(1)(b)
Client relationship management	Legitimate interest — GDPR Art. 6(1)(f)
Invoicing, tax and regulatory records	Legal obligation — GDPR Art. 6(1)(c)

Access

- Internal: Only staff who requires data access
- External: Only affiliates, partners, and subcontractors under a signed Data Processing Agreement (DPA)
- International: International transfers are made only via Standard Contractual Clauses (SCC) or equivalent safeguards.

Data Processing

Where we process personal data on behalf or include Sub-processors, a DPA under GDPR Art. 28 is executed before processing begins. Sub-processors are bound by equivalent obligations under GDPR Art. 28(4).

Retention

Commercial and project records are retained for the legally required period — typically 10 years under German and Swiss commercial law, or up to 15 years where MDR or FDA regulatory obligations apply.

Data Security

We protect all personal data through:

- Encryption of data in storage and in transit
- Access controls based on the principle of least privilege
- Regular security testing and vulnerability assessments
- Staff training on data protection and information security
- Incident response procedures — breaches are reported to supervisory authorities within 72 hours (GDPR Art. 33)

INTERNATIONAL DATA TRANSFERS

Destination	Safeguard
United Kingdom	Mutual adequacy decisions (EU ↔ UK); UK GDPR SCCs where applicable
USA	SCC + EU-US Data Privacy Framework; HIPAA where health data is involved
Switzerland	revDSG adequacy
Japan	EU-Japan adequacy decision; APPI compliance
China	PIPL and CSL compliance; CAC security assessment where required

No data is transferred to a third country without an appropriate legal safeguard.

DATA PROTECTION IMPACT ASSESSMENTS

We conduct a DPIA (GDPR Art. 35) before any processing likely to result in high risk, including:

- Large-scale processing of health or special category data (Art. 9 GDPR)
- Use of new technologies or processing methods
- Studies or tests involving vulnerable participants or patients
- HCP studies where combined professional and clinical data creates elevated data protection risk
- Systematic or comprehensive analysis of behavioral or use-related data
- Projects subject to EU MDR, IVDR or FDA requirements

We systematically analyze the risks associated with data processing, take appropriate protective measures and document this in a comprehensible manner. Where risk cannot be adequately mitigated, we consult the

competent supervisory authority in advance (GDPR Art. 36). Information about conducted DPIAs is available on request.

Your Rights

All requests are handled within 30 days. Contact: dpo@efty.group

Right	Basis
Access	GDPR Art. 15
Rectification	GDPR Art. 16
Erasure	GDPR Art. 17
Restriction	GDPR Art. 18
Portability	GDPR Art. 20
Objection	GDPR Art. 21
Withdrawal of consent	GDPR Art. 7(3)

Withdrawal does not affect the lawfulness of prior processing. UK residents hold equivalent rights under UK GDPR and may escalate to the ICO (ico.org.uk).

Research & Ethics Standards

As a research firm, we adhere to the most stringent industry standards:

- ISO 20252 – international quality standard for market, opinion, and social research
- EphMRA – European Pharmaceutical Market Research Association
- ADM – Association of German Market and Social Research Agencies (Arbeitskreis Deutscher Markt- und Sozialforschungsinstitute)
- BVM – Association of German Market and Social Researchers (Berufsverband Deutscher Markt- und Sozialforscher)
- DGOF – German Society for Online Research (Deutsche Gesellschaft für Online-Forschung)

In practical terms, this means for you:

- Research data is never used for advertising or sales purposes.
- All studies are documented in accordance with quality assurance protocols.
- Subcontractors must comply with these same standards.
- Online surveys are conducted only with explicit opt-in.
- We never deceive participants regarding the purpose of a study.

Complaints

We encourage you to contact us first at dpo@efty.group — we aim to resolve concerns directly. You may also contact the relevant supervisory authority:

- Germany: Hessian Commissioner for Data Protection — www.datenschutz.hessen.de
- Switzerland: FDPIC — www.edoeb.admin.ch
- United Kingdom: ICO — www.ico.org.uk
- EU (other member states): Your national data protection authority
- USA: FTC — www.ftc.gov

Policy Updates

The current version of this policy is always available at www.efty.group/privacy. We notify you directly of any significant changes.

Ergonomics Factory Sàrl and KDA User and Market Research GmbH