

Last updated: October 2025

PRIVACY NOTICE REGARDING THE USE OF THE “Dräger Companion med” APP

The purpose of this privacy notice is to inform you of the basis on which and the purposes for which we process personal data that we collect from you or that you provide to us when you use the “Dräger Companion med” app (the “App”). We also wish to inform you of your data protection rights and other conditions governing data processing.

The App is a medical device classified for the European Economic Area and complies with the requirements of Regulation (EU) 2017/745 (Medical Devices Regulation – MDR).

Further information can be found in the App’s Terms of Use.

The App will process your personal data in strict confidence and for specific purposes in accordance with the following information.

Who is responsible for data processing and who can I contact?

The data controller within the meaning of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (DSG) is:

Dräger Safety AG & Co. KGaA (“Dräger”)

Revalstraße 1

23558 Lübeck

jointly responsible with

BAYOOCARE GmbH (“BAYOOCARE”)

Europaplatz 5

64293 Darmstadt

You can contact the data protection officers of the data controllers using the contact details provided above, or by email at: [dataprivacy\(at\)draeger.com](mailto:dataprivacy(at)draeger.com) and [dataprivacy\(at\)bayoocare.com](mailto:dataprivacy(at)bayoocare.com).

The key points regarding the division of responsibilities between the data controllers are set out in the table below. For clarity: this does not in any way affect your legal rights under data protection law against either or both of the data controllers.

Processing activity/obligation	Responsibility/Point of contact
Back-end system for data storage	Dräger
App operations (including vigilance)	BAYOOCARE
Technical 1st and 2nd-level support	Dräger
Third-level technical support	BAYOOCARE
Operation of the ticketing system for 1st/2nd/3rd-level support	Dräger
Exercise of data subjects’ rights under Article 15 et seq. of the GDPR and Article 19 of the DSG	Dräger, BAYOOCARE
Information for data subjects pursuant to Article 12 et seq. of the GDPR and Article 19 et seq. of the DSG	BAYOOCARE

1. What data do we process?

When using the app, the following personal data relating to you will be processed:

- Name
- (Delivery) address
- E-Mail and password
- Breath alcohol test results and times
- Images taken during measurements
- Usage data, which is used in anonymised form to ensure the proper functioning of the app and to improve it (such as any ‘crashes’ or other bugs)
- Master data relating to your therapist and/or doctor

2. Where do we store your personal data?

Your personal data is initially stored exclusively on your smartphone. If you decide to share your data with your therapist and/or doctor, it will also be stored for this purpose on servers maintained by Dräger (‘back-end’). In all cases, we ensure that the servers used to store your data are located exclusively within the European Union.

3. For what purpose do we process your data, and on what legal basis?

We process personal data in accordance with the provisions of the GDPR and the Federal Data Protection Act (FADP):

3.1. To fulfil contractual obligations (Article 6(1)(b) of the GDPR, Article 6 of the DSG)

We process the data covered by the contract in order to provide and allocate the contractually agreed services to you, and to be able to make the data available to the correct recipients.

3.2. Processing of personal health data based on your consent (Article 6(1)(a) GDPR, Article 9(2)(a) GDPR, Article 6 DSG). When you launch the app for the first time, you consent to the processing of your health data by tapping a button. Based on your consent, we process your health data in order to provide you with relevant app services.

3.3. To assert, exercise or defend legal claims (Article 9(2)(f) of the GDPR, Article 6 of the DSG). Where necessary, we may process your data to assert, exercise or defend legal claims.

3.4. To comply with legal obligations (Article 9(2)(i) of the GDPR, Article 83(3)(e) and (f) of the Medical Devices Regulation, Article 9 of the Data Protection Act)

Finally, we process data to the extent necessary to fulfil our legal obligations in the field of medical device vigilance.

4. To whom will my personal data be disclosed?

In order to provide the services included in the app, we will share your data with your therapist and/or doctor, provided you use this feature.

Furthermore, in principle, only those individuals who require the data to fulfil our contractual and, where applicable, legal obligations will be granted access to it. Service providers and agents engaged by us may also be granted access to data for these purposes; for example, in relation to outsourced IT services (e.g. hosting). In such cases, we ensure through binding agreements with these service providers that the data protection requirements for their involvement are fully met.

Furthermore, we do not transfer any personal or personally identifiable data about you to third parties without your express prior consent.

You are free to extract the results generated via the app in the form of a PDF report and then forward them to third parties yourself.

5. Is the provision of personal data required by law or under a contract?

You are not obliged to provide us with the aforementioned personal data. Please note, however, that providing incorrect or incomplete data will prevent us from providing the service properly via the app.

6. How long will my data be stored?

You can delete data yourself at any time via the app. Otherwise, Dräger will delete data stored in the back-end immediately upon termination of the relevant user relationship (within 60 days at the latest).

Please note that we may need to retain certain categories of data for longer; for example, due to mandatory tax or social security regulations concerning financially relevant billing data. The same applies in the event of other circumstances that justify longer retention – for example, until the expiry of the standard limitation period, where claims for damages are imminent, or until the expiry of regulatory deadlines, where a retention period under medical device law applies.

7. Your rights as a data subject

As a data subject, you have the right of access under Article 15 of the GDPR and Article 25 of the DSG, the right to rectification under Article 16 of the GDPR and Article 32(1) of the DSG, the right to erasure under Article 17 of the GDPR and Article 32, (2)(c) of the DSG, and the right to restriction of processing under Article 18 of the GDPR and Article 32(2)(b) of the DSG.

Details on to whom and how you can exercise these rights can be found in section 1 above.