Data Protection Notice for Support Requests

Version: V01
Date of issue: September 2026

Mikrogen GmbH pays particular importance to data protection. Whenever someone contacts our company with a question, a technical issue, a service request or a complaint, the processing of personal data is necessary for this purpose. With this data protection notice we wish to inform you, in accordance with Art. 13 and Art. 14 GDPR, of the nature, scope and purpose of the personal data collected and processed in this context, as well as of the rights to which you are entitled.

1. Scope of this Data Protection Notice

This data protection notice applies to the handling of support requests, service cases and complaints that reach Mikrogen GmbH by email or by telephone. For handling and documentation, Mikrogen GmbH uses a ticket system in which the request is recorded and processed as a case.

For the use of the websites of Mikrogen GmbH in all other respects, in particular with regard to cookies, server log files, web analytics and registration, the general privacy policy published at https://www.mikrogen.de/en/privacy-policy applies.

2. Name and Address of the Controller

The responsible entity within the meaning of the General Data Protection Regulation, of the other data protection laws applicable in the Member States of the European Union and of other provisions of a data protection nature is:

Mikrogen GmbH
Anna-Sigmund-Str. 10
82061 Neuried
Germany
T +49 89 54801-0
mikrogen@mikrogen.de
www.mikrogen.de

3. Name and Address of the Data Protection Officer

The data protection officer of the entity responsible is:

Anne Meyer
Mikrogen GmbH
Anna-Sigmund-Str. 10
82061 Neuried
Germany
T +49 89 54801-0
mikrogen@mikrogen.de

Anyone may contact our data protection officer directly at any time with all questions and suggestions concerning data protection.

4. Purposes of Processing and Legal Bases

Purpose	Legal basis	Legitimate interest
Handling and answering your request	Art. 6(1)(f) GDPR; where the data subject is itself a contracting party, additionally Art. 6(1)(b) GDPR	Answering the request addressed to us and maintaining the business relationship
Traceable documentation of the case and handover between the responsible employees	Art. 6(1)(f) GDPR	Continuous handling irrespective of absences and avoidance of unanswered requests
Evaluation of the volume of requests and of recurring error patterns	Evaluations are carried out in aggregated form without any reference to a person; where a reference to a person exists in an individual case: Art. 6(1)(f) GDPR	Improvement of our products, our documentation and our support processes

5. Contacting Us and Course of Processing

Mikrogen GmbH can be contacted by email and by telephone. There is no customer portal, no web form and no registration for support requests.

Your message is recorded as a case in our ticket system and assigned to a responsible employee. You receive an automatic acknowledgement of receipt stating a case number and a reference to this data protection notice. If you contact us by telephone, the responsible employee creates the case using the information provided by you.

Your message, our replies and the further course of the correspondence are stored in the ticket system so that your request can be handled without gaps even in the event of absence or a change of contact person.

6. Categories of Personal Data Processed

In particular, the following data may be processed:

- Contact details: form of address and title, name, function, institution and its address, business email address and telephone number as well as, where applicable, the customer number
- The content of your request and of all further correspondence
- The attachments transmitted by you, for example screenshots, log and device data or configuration files
- Technical metadata such as email header data and time stamps
- Information on the products, lots, devices and software versions concerned
- Log data of the ticket system on access and processing steps

7. Personal Data of Third Parties Contained in Your Request

Requests may contain information on further persons, for example on colleagues of the requesting person, on further contact persons of the institution or on employees of a distribution partner. This data originates from the request itself or from the correspondence relating to the case and not from publicly accessible sources. It is processed for the same purposes and on the same legal bases as the data of the requesting person.

These persons are generally not notified separately, as this would involve disproportionate effort (Art. 14(5)(b) GDPR). Instead, this data protection notice is made publicly available. Affected subjects may exercise their rights at any time in accordance with Section 14.

8. No Transmission of Patient Data

Mikrogen GmbH does not require any patient data in order to handle your request. We therefore ask you to remove or anonymize personal data of third parties before transmitting screenshots, printouts, raw data or log data to us.

Should we nevertheless receive such data, we remove it from the active case as soon as we become aware of this and restrict access to it. Where the information forms part of a complaint or vigilance case, we are not permitted to delete it; in this case processing is restricted to the fulfilment of the regulatory obligations. The legal basis in this respect is Art. 9(2)(i) GDPR in conjunction with Regulation (EU) 2017/746.

9. Recipients of the Personal Data

Within Mikrogen GmbH, access to your data is granted only to those employees who require it in order to handle your request. These are the Customer Support and Service departments and, where necessary, Sales and Product Management. Access is limited to what is necessary in each case by means of a role and authorization concept.

Disclosure to external recipients takes place to:

- The provider of the ticket system and IT service providers for operation and remote maintenance, in each case as processors on the basis of an agreement pursuant to Art. 28 GDPR
- Our distribution partners, in so far as they are involved in the handling of your request
- Authorities and notified bodies, in so far as a reporting, information or documentation obligation exists, in particular within the scope of vigilance for in vitro diagnostic medical devices vis-à-vis the German Federal Institute for Drugs and Medical Devices (BfArM) and via the European database EUDAMED

10. Transfer to Third Countries

The ticket system is operated in data centres located within the European Union.

For individual functions of the ticket system, the provider uses sub-processors outside the European Union. These functions are not used by Mikrogen GmbH. A transfer of your data to these sub-processors therefore does not take place. Mikrogen GmbH is actively informed by the provider of every change to the sub-processors and assesses the impact of such changes on the use of the ticket system and on our customers on a case-by-case basis.

11. Storage Period

General support and service requests are stored in the ticket system for 24 months after the case has been closed and are deleted thereafter. The criterion for this period is the time span within which, in the case of recurring requests concerning the same product or device, experience shows that the previous history needs to be consulted.

Cases relating to complaints, product deviations or vigilance reports are transferred to the quality management system of Mikrogen GmbH and are retained there in accordance with the retention periods of Regulation (EU) 2017/746. The copy in the ticket system is deleted after the transfer within the period stated above.

The underlying email in our mailbox as well as data backups are subject to their own deletion cycles; deletion takes effect there with the next routine deletion in each case.

12. Advertising and Automated Decision-Making

The data collected in connection with your request is used exclusively for the purposes set out in Section 4. It is not used for advertising, newsletters, marketing campaigns or the compilation of mailing lists; the data is not transferred into marketing or newsletter systems. Mikrogen GmbH does not conduct satisfaction surveys via the ticket system.

As a responsible company, we refrain from automated decision-making and profiling. Functions of the ticket system for automated evaluation or for the generation of suggestions by means of artificial intelligence are deactivated.

The provider of the ticket system processes your data exclusively on the instructions of Mikrogen GmbH. Any use for the provider's own purposes or for the training of artificial intelligence models is contractually excluded.

13. Security of Processing

Mikrogen GmbH has implemented numerous technical and organizational measures in accordance with Art. 32 GDPR in order to protect the personal data processed in the ticket system. These include in particular encrypted transmission and storage, personalized access accounts, a role-based authorization concept and the logging of access.

Nevertheless, internet-based data transmissions may in principle have security gaps, so that absolute protection cannot be guaranteed. This applies in particular to email sent without encryption.

14. Rights of the Data Subject

Every person affected by the processing of personal data has the right to confirmation and access (Art. 15 GDPR), to rectification (Art. 16 GDPR), to erasure (Art. 17 GDPR), to restriction of processing (Art. 18 GDPR) and to data portability (Art. 20 GDPR). Where the processing is based on Art. 6(1)(f) GDPR, there is additionally the right to object at any time, on grounds relating to the particular situation of the data subject (Art. 21 GDPR). A detailed description of these rights is contained in the general privacy policy of Mikrogen GmbH (https://www.mikrogen.de/en/privacy-policy).

Regulatory retention obligations may preclude erasure (Art. 17(3)(b) GDPR). In such a case, processing is restricted to the fulfilment of these obligations.

In order to exercise their rights, data subjects may contact us at any time using the contact details stated in Sections 2 and 3.

15. Right to Lodge a Complaint with a Supervisory Authority

Every data subject has the right to lodge a complaint with a data protection supervisory authority. The authority responsible for Mikrogen GmbH is the Bavarian State Office for Data Protection Supervision (Bayerisches Landesamt für Datenschutzaufsicht), Promenade 27, 91522 Ansbach, Germany.

16. Necessity of Providing the Personal Data

The provision of your data is generally voluntary and is neither legally nor contractually required. However, without contact details and without information on your concern, Mikrogen GmbH cannot handle your request.

Different rules apply to complaints and reports relating to vigilance. As a manufacturer of in vitro diagnostic medical devices, Mikrogen GmbH is legally obliged to document such cases in a comprehensible manner and to keep them traceable. The information required for this purpose cannot be removed on request.

17. Amendments to this Data Protection Notice

Mikrogen GmbH amends this data protection notice if the processing described changes. The version published on our website applies in each case; the date of issue is stated at the beginning of the document. Earlier versions are retained and made available on request so that the information valid at the time of a given case remains traceable.