

# Data Protection Notice for SWISS Medical Services

## Data Protection Notice for SWISS Medical Services

In this Data Protection Notice, we provide you with specific information on our data processing regarding SWISS Medical Services. Further information is available in the general [Data Protection Notice of SWISS](#) which also applies to SWISS Medical Services. This information is particularly intended for ("you"):

- passengers;
- employees of Swiss International Air Lines Ltd., and of other companies with whom we have a relationship with concerning provision of medical services in relation to occupational medicine;
- individuals who use or may be interested in our services;
- individuals who contact us.

If you provide us data about other persons (e.g. family members), we assume that you are authorized to do so and that the data is correct. Please ensure that affected persons have been informed about this Data Protection Notice.

### 1. Data Controller

Unless communicated otherwise, the controller of the data processing described in this Data Protection Notice is:

Medical Services, Swiss International Air Lines Ltd.  
Obstgartenstrasse 25  
8302 Kloten  
Switzerland  
Website: [SWISS Medical Services | SWISS](#)  
(herein «SWISS Medical Services», «we» or «us»)

The SWISS Medical Services practice is licensed as medical institution by the Canton of Zurich, Switzerland. When SWISS Medical Services processes personal data in its capacity as medical institution, it acts as a controller within the meaning of data protection law (separate from Swiss International Air Lines Ltd.). As such, it provides the following services:

- **Mandatory medical services for flying purposes** (for example, when we provide services in connection with EASA regulations concerning flying staff)
- **Occupational Medicine** (for example, when we conduct analysis and provide recommendations to any employee of Swiss International Air Lines Ltd., or any other company, when a suspicion arises that the health problem cause is in relation to the daily work of the employee, such as jetlag or sleeping problems after shiftwork)
- **Travel Medicine** (we are a public vaccination center and advisory board for travel medicine. We provide travel medicine services in connection with travelling to exotic areas and advise on precautionary measures about infectious diseases such as Malaria, or about mountain sickness and scuba diving).
- **Handling of passengers with health issues** (for example, when we process individual requests, and provide advisory medical clearances such as fit- to- fly clearances etc.)

(hereinafter "medical services")

### 2. Contact

If you have any questions about data protection or if you wish to exercise your rights under data protection law, please contact the staff of SWISS Medical Services or your doctor directly.

### 3. How do we collect your personal data? What sources and data do we use?

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On one hand, we collect your personal data when you come in person to our SWISS Medical Services practice prior and during provision of the medical services (when you fill-out a patient form). We may also receive your personal data via email, or regular mail service (when an appointment is made).

Your personal data collected includes for example personal information provided on the patient form, such as your name and last name, contact details, insurance details, as well as other data attributes, remarks regarding your medical history, past treatments, allergies, diagnoses, therapies, and medical findings. Such medical history data is collected when an interview is conducted by the medical professional prior to the medical services provided or upon commencement of medical services. It is stored on our internal systems.

On the other hand, we also receive your personal data from other physicians and health care professionals with whom you have been or are receiving treatment from or third parties that SWISS Medical Services are in contractual relationship with (e.g. laboratories).

We may further receive your personal data from dedicated teams of Swiss International Airlines Ltd., particularly flying staff when a health incident occurs on board of the aircraft. In such cases, we receive details of the medical incident on board, full name of the passenger, description of the event occurred, treatment received, and flight information details. We only use your personal data in order to be able to answer any questions your treating physician may have and to ensure that the health equipment on board of the aircraft is fully functioning and is kept up to date.

Lastly, we may receive your health data from your family members, friends, travel agency, insurance company or another third party when you fill-out a health assistance form on our website and request assistance in connection with your flight.

## 4. Why do we process your personal data (purpose of processing) and on what legal basis?

### a) Performance of a contract

In most situations, we process your personal data based on performance of a contract, meaning when we provide medical services to you.

### b) Compliance with laws, regulations, and orders

Furthermore, we process personal data based on legal obligations. As SWISS Medical Services, we provide medical services, which are subject to various legal obligations, meaning statutory requirements (Accidental Insurance Act, Federal Health Insurance Act) and flight or other regulatory authority requirements (such as FOCA – Federal Office of Civil Aviation, EASA - European Union Aviation Safety Agency, FAA – Federal Aviation Administration, Transport Canada, and any other Civil Aviation Authority worldwide, Road Traffic Authorities etc.).

### c) Consent

We may process your personal data for specific purposes if you have given us your consent. The consent can be revoked. Revocation will be effective for the future. Processing carried out prior to the revocation will therefore not be affected.

## 5. What do we process your personal data for?

We process your personal data in order to provide you with medical services and to ensure we provide you with highest quality of medical advice. We may for instance work closely with selected third parties who help us provide you with services which we do not have the capacity to provide independently (laboratories, pharmaceutical companies if specific medicaments or vaccinations shall be ordered etc.). For example, we may process your personal data for the following purposes:

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- Administrative purposes (making, editing and cancelling appointments - in order to be able to contact you);
- Insurance and payment purposes;
- Conducting mandatory checks under the applicable aviation legislation (EASA, FAA, etc.) and reporting status of fitness to fly;
- Documenting your medical history and medical advice provided;
- Generating prescriptions and ordering medication;
- Reporting Infectious diseases (e.g. Covid testing, malaria testing – based on the list of infectious diseases which are reportable to the Federal Office of Public Health as well as cantonal medical offices);
- Providing information to other physicians – referrals to specialists; laboratories;
- Auditing (e.g. by Federal Office of Civil Aviation, and other authorities);
- Generating invoices for treatment;
- Ongoing monitoring (if needed where the diagnosis requires regular check-ups);
- Handling patients' inquiries

## 6. Who receives my data?

We will only transfer your personal data, in particular medical data to external third parties if permitted or required by law, or where data shall be transferred due to the provision of medical services. For example, there are the following recipients of your personal data:

- Data is transferred to your health insurance company or to the accident or disability insurance company for the purpose of issuance of invoice for the medical service incurred.
- Disclosure to cantonal and national authorities (e.g. cantonal medical service, health departments etc.)
- Disclosure to national and international air safety organizations and authorities, where applicable
- Disclosure of data in connection with harm, injury and criminal acts to authorities and insurance companies, only where applicable.
- Only where applicable, transfer of necessary patient and billing data to the finance department of Swiss International Air Lines Ltd., where monetary claims are outstanding;

Your personal data may be further disclosed to respective teams of Swiss International Air Lines Ltd. and third parties, for example where we process your personal data for the purpose of handling your travel health requests in connection with your flight (in connection with the contract of carriage).

## 7. Transfer of personal data to countries outside Switzerland and the European Economic Area

When advising on fit-to-fly medical checks, e.g. in case of pilots, who hold a foreign pilot license, results of the medical checks are shared with the respective Civil Aviation Authority of the state, which issued the pilot license (in compliance with the respective legal obligation), we transfer, store and process your personal data potentially in every country of the world according to this Data Protection Notice. The countries in question may not have laws that protect your personal data to the same extent as in Switzerland or the EEA.

## 8. Retention of personal data

We retain your personal data:

- for as long as it is required for the purpose of processing and compatible purposes, in the case of contracts normally for at least the duration of the contractual relationship;
- for as long as it is subject to a statutory retention requirement. For example, a twenty-year or forty-year retention period applies to specific medical data;
- for as long as we have a legitimate interest in storing it. This may be the case, in particular, if we need personal data to enforce or defend claims, for archiving purposes, and to ensure IT security.

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Specific examples for retention periods based on our legitimate interest are the following:

- we generally retain contractual data for ten years after contractual expiry as claims may arise during this time (statute of limitation).

## 9. Your rights regarding your personal data

Provided the applicable conditions are met and there are no applicable statutory exceptions, you also have the following rights:

- the right to request information about your personal data stored by us;
- the right to have inaccurate or incomplete personal data corrected;
- the right to request the deletion or anonymization of your personal data;
- the right to request that the processing of your personal data be restricted;
- the right to receive certain personal data in a structured, commonly used and machine-readable format;
- the right to revoke consent with effect for the future, insofar as processing is based on consent.

Please note that these rights may be restricted or excluded in individual cases, e.g. if there are doubts about the identity or if this is necessary to protect other persons, to safeguard interests worthy of protection or to comply with legal obligations. If exercising certain rights will incur costs on you, we will notify you thereof in advance.

In general, exercising these rights requires that you prove your identity (with a copy of your passport or ID where your identity is not evident otherwise or can be verified in another way).

You can exercise these rights:

- by contacting SWISS Medical Services directly or your respective medical professional.

While we hope we can address any concerns you may have related to our data processing, you are free to lodge a complaint with a competent supervisory authority.

## 10. Changes to our Data Protection Notice

This Data Protection Notice may be changed from time to time and without prior notice or announcement. The current version published on our website shall apply.

Last updated on 1 September 2023.