



DATA PROTECTION IMPACT ASSESSMENT

Assessment of the risks of processing patients' health data on Consult Your Doctor

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1. Why this assessment is needed

Consult Your Doctor processes health data on a large scale, uses artificial intelligence to check prescriptions and follow up patients, and moves data between Germany and India. This type of processing is likely to involve a high risk to the rights of individuals, so the General Data Protection Regulation requires an assessment before it begins, and the company applies the same standard to its work in India.

2. Description of the processing

Patients give their details and symptoms to a licensed doctor through the platform. The doctor records a consultation and issues a prescription, which is checked by automated tools, and the patient may be referred to a diagnostic centre. After the consultation Zebroid AI contacts the patient for twelve days. Records are stored securely and may be accessed by the treating doctor, the diagnostic centre, authorised staff and processors, from Germany and from India. The data processing record (CYD-DP-01) lists the detail.

3. Necessity and proportionality

- Only data needed for care and follow-up is collected; optional data is marked as optional.
- The legal basis for each activity is recorded in CYD-DP-01, and explicit consent is obtained for health data and for AI-assisted checking and follow-up.
- Access is limited by role (CYD-SEC-01) and every access to a record is logged.
- Patients are informed through the privacy notice and can exercise their rights through the grievance officer (CYD-DP-03).
- Processors are bound by written agreements, and transfers between the EU and India use the safeguards in CYD-DP-06.

4. Risk assessment

Risk to the individual	Likelihood	Severity	Measures	Residual risk
Unauthorised access to health records	Medium	High	Role-based access, multi-factor login, encryption, logging, staff training	Low
Data sent to the wrong person (messages, reports)	Medium	High	Verified contact details, minimal content in messages, secure links	Low
Harm from an AI error (missed or false flag)	Medium	High	Doctor approves every prescription; monitoring; escalation protocol (CYD-AI-01, CYD-AI-02)	Medium
Loss of data or service failure	Low	High	Backups, continuity plan (CYD-BCP-01)	Low
Transfer to a country without equivalent protection	Medium	Medium	Standard contractual clauses, transfer assessment, encryption (CYD-DP-06)	Low
Keeping data longer than needed	Medium	Medium	Retention schedule and deletion routine (CYD-DP-04)	Low
Misuse of data by a vendor	Low	High	Processor agreements, audits, limits on vendor use	Low



5. Consultation

The company consults its data protection lead, its medical lead, its security lead, and where appropriate patients or patient representatives. Where residual risk remains high after measures are applied, the competent supervisory authority is consulted before processing starts.

6. Conclusion and sign-off

Item	Entry
Overall residual risk	
Actions still open (owner and date)	
Data protection lead's advice	
Assessment date and next review	

7. Data flows

Data moves through the platform in five stages: (1) the patient's account and identity data is created in the app and stored in the platform database; (2) during a consultation the doctor sees the record and adds notes and the prescription; (3) the prescription is sent to the automated checking service and returned to the doctor; (4) test referrals and results move between the platform and the diagnostic centre; (5) after the consultation Zebroid AI sends follow-up messages through the messaging provider and the replies return to the record. At each stage data is encrypted in transit. Staff and doctors in Germany and in India may access records according to their role.

8. Lawful basis

Processing	Basis under the GDPR	Basis under India's Act
Health care and prescription	Provision of health care (Art. 9(2)(h)); consent where the doctor or country requires it	Consent, and legitimate use where the Act allows
AI-assisted checking and follow-up	Explicit consent (Art. 9(2)(a))	Consent
Records required by law	Legal obligation	Legitimate use for legal obligations
Payments	Contract	Consent or legitimate use
Security and fraud prevention	Legitimate interests	Legitimate use

The data protection lead and counsel confirm the bases for each country before launch.

9. Measures that show compliance

- The record of processing (CYD-DP-01), the privacy notice and consent forms (CYD-DP-03), the retention policy (CYD-DP-04), the breach plan (CYD-DP-05) and the transfer policy (CYD-DP-06).
- Role-based access, encryption and logging under CYD-SEC-01.
- Training of all staff and doctors on data protection.
- Agreements with every processor, and regular reviews of vendors.
- A named data protection lead and, if required, a data protection officer.



10. Monitoring and review

The data protection lead reviews this assessment every year, and whenever the purpose, the technology, the places where the data is handled or the vendors change. Incidents and complaints are also used to test whether the assessment was right. If the review finds that a risk has grown, the directors decide on further measures before processing continues.

11. Views of those affected

The company seeks the views of patients and doctors on the design of the consent screens, the follow-up messages and the privacy notice, through short surveys and interviews with a sample of users, and records the results. Concerns about the use of AI, about messages being seen by others and about the sharing of results are considered in the design.

12. Residual risk and decision

After the measures in this assessment are in place, the main remaining risk is the possibility that an AI flag is wrong or missing. This risk is accepted because a doctor reviews every prescription, because the protocol sends red flags to a human at once and because performance is monitored every month. If monitoring shows a rise in errors, the directors will pause the function and review the assessment.

13. Action plan

Action	Owner	Due
Finalise lawful bases with counsel in each country	Data protection lead	
Complete vendor agreements and transfer assessments	Legal adviser	
Run a first security test and fix findings	Technical lead	
Train staff and doctors	Data protection lead	

14. Conclusion

With the measures described, the company concludes that the processing is necessary and proportionate for the purpose of delivering and following up health care, and that the remaining risks are acceptable and are controlled. The conclusion is subject to the completion of the actions in the action plan.

Approval

This document is approved by the directors of Zebrold Private Limited, the operator of Consult Your Doctor.

Hemendrah Kumar Sadamsetty

Electronically signed | November 5, 2026

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Director, Zebrold Private Limited

Date: November 5, 2026

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