

RECORD OF PROCESSING ACTIVITIES

In accordance with Art. 12 FADP (SR 235.1)

[Name of the dental practice]

[Full address]

Version 1.0 | [Date of creation]

Last updated: [Date]

1. Identity of the controller

Name of the practice	[Name of the practice]
Address	[Address, postcode, town]
Responsible practitioner	[Surname and first name of the practice owner]
Contact e-mail	[Work e-mail]
Phone	[Phone number]
IT provider	[Name of the provider, e-mail, phone]

2. Processing activities

The table below lists all the processing of personal data carried out by the practice.

2.1 Management of patient files

Item	Description
Purpose	Dental care, medical follow-up, treatment planning
Categories of persons	Patients of the practice
Categories of data	Identification data (surname, first name, date of birth, address, AHV number), health data (medical history, diagnoses, treatment plans, prescriptions, X-rays, intraoral photos, digital impressions, 3D models), insurance data (basic health insurance, supplementary insurance)
Legal basis	Performance of the treatment contract, patient's consent, legal obligation (Medical Professions Act, cantonal law)
Recipients	Practitioners of the practice, dental assistants, dental laboratories (if necessary), referring doctors (if necessary), insurers (invoicing)
Transfer abroad	No (unless cloud software with servers outside Switzerland: [specify])
Retention period	[Period chosen by the practice, 20 years recommended] after the last treatment, at least the period set by the applicable cantonal law (at least 10 years in Geneva, in the canton of Vaud and in Fribourg, at least 20 years in Valais, in Neuchâtel and in the canton of Bern)
Security measures	Management software with access by personal login, 2FA, drive encryption, 3-2-1 backups, EDR on all computers

2.2 Management of appointments and the appointment book

Item	Description
Purpose	Scheduling consultations and sending reminders
Categories of persons	Patients of the practice
Categories of data	Surname, first name, phone number, e-mail, reason for the appointment
Legal basis	Performance of the treatment contract
Recipients	Practice staff (reception, practitioners)
Transfer abroad	[Yes/No, depending on the tool used]
Retention period	Duration of the patient relationship, then archived with the file
Security measures	Access restricted to authorised staff, screen not visible from the waiting room

2.3 Invoicing and accounting

Item	Description
Purpose	Issuing invoices, collecting payments, accounting
Categories of persons	Patients, insurers, suppliers
Categories of data	Name, address, insurance data, services invoiced, amounts, payment methods
Legal basis	Performance of the contract, legal obligation (CO Art. 957 ff.)
Recipients	Administrative staff, external fiduciary/accountant, insurers
Transfer abroad	No
Retention period	10 years (CO Art. 958f)
Security measures	Access restricted to administrative staff and the practitioner, encryption

2.4 Communication with patients

Item	Description
Purpose	Professional correspondence (reminders, results, information)
Categories of persons	Patients of the practice
Categories of data	Name, e-mail, phone number, content of messages (which may include health data)
Legal basis	Performance of the treatment contract, consent
Recipients	Practitioner, patient concerned
Transfer abroad	No if Swiss encrypted e-mail (HIN, ProtonMail). [Specify if another tool]
Retention period	Duration of the patient relationship, messages archived with the file
Security measures	End-to-end encrypted e-mail for any content including patient data

2.5 Staff management

Item	Description
Purpose	Administration of employment contracts, salaries, training
Categories of persons	Employees, trainees, locums
Categories of data	Name, address, date of birth, AHV number, bank details, employment contract, training certificates
Legal basis	Performance of the employment contract, legal obligations (CO, AHV, occupational pensions)
Recipients	Responsible practitioner, fiduciary, social insurance, pension fund
Transfer abroad	No
Retention period	10 years after the end of the employment contract (CO Art. 958f, AHV/occupational pension periods)
Security measures	Access restricted to the responsible practitioner, documents under lock and key or in an encrypted folder

2.6 Video surveillance (if applicable)

Item	Description
Purpose	Security of the premises
Categories of persons	Anyone entering the premises
Categories of data	Video images
Legal basis	Overriding private interest (safety of persons and property, Art. 31 para. 1 FADP), information of the persons concerned (signage)
Recipients	Responsible practitioner, police (on request only)
Transfer abroad	[Depending on the system: local or cloud storage]
Retention period	As a rule 24 to 72 hours (FDPIC recommendations), unless an incident justifies longer retention
Security measures	Restricted access, encrypted storage, signs informing people of the surveillance

3. Processors (Art. 9 FADP)

List of processors with access to the practice's personal data:

Processor	Service	Data accessible	Location	Art. 9 agreement
[IT provider]	[Maintenance, monitoring]	[Metadata, credentials]	[Country]	[Yes/No]
[Cloud hosting provider]	[Storage]	[Depending on scope]	[Country]	[Yes/No]
[Dental laboratory]	[Prostheses, impressions]	[Patient data if identifiable]	[Country]	[Yes/No]
[Fiduciary/accountant]	[Accounting]	[Invoicing data]	[Country]	[Yes/No]
[Software vendor]	[Cloud management software]	[Depending on scope]	[Country]	[Yes/No]

4. Transfers abroad (Art. 16 FADP)

[If data is transferred outside Switzerland, state for each transfer: the country of destination, the processor concerned, and the applicable safeguard (adequacy decision of the Federal Council, standard contractual clauses, explicit consent).]

[If there is no transfer: "No personal data is transferred outside Switzerland."]

This record must be updated with every significant change: new processor, new software, change in the categories of data processed, change in retention period. In the event of an investigation, the FDPIC may require access to it (Art. 49 para. 3 and 50 para. 1 FADP).

Legal notice and terms of use

This document was written by **DentalSystems Sàrl** for information and awareness purposes. It does not constitute legal advice. The information in this document is up to date as of October 2026 and may change as legislation and regulations evolve. This English version is a translation; the French version prevails.

For any legal question relating to the FADP, the GDPR or data protection in the medical context, consult a lawyer specialising in the field.

Intellectual property

This document is the exclusive property of DentalSystems Sàrl. All of its content (texts, structure, layout and graphic elements) is protected by copyright in accordance with the Federal Act on Copyright and Related Rights (CopA, SR 231.1).

Permitted use

This template is made available free of charge. It may be modified and used under the practice's name, including with its patients, staff and providers, without keeping our references.

Prohibited use

Unless DentalSystems Sàrl has given its prior written consent, the following are prohibited:

- Selling this document, even in modified form.
- Offering it for download to third parties (download sites, sharing platforms, resellers).

The terms of use published on www.dentalsystems.ch apply; in the event of a discrepancy, they prevail over this notice.

Limitation of liability

This document is provided free of charge, for information. To the extent permitted by Swiss law, DentalSystems Sàrl is not liable for the consequences of its use; this limitation does not apply in the event of intent or gross negligence. Users remain responsible for adapting it to their situation. It replaces neither a professional audit nor legal advice.

DentalSystems Sàrl

Thomas Alvino, IT Technician

www.dentalsystems.ch | talvino@dentalsystems.ch | +41 77 245 48 44

© 2026 DentalSystems Sàrl. All rights reserved.