

Research and development by Implicity

Implicity commercializes a remote monitoring platform for patients suffering from cardiovascular diseases including patients with connected cardiac devices (including pacemakers, defibrillator, ILR and other devices), or patients suffering from heart failure. The platform enables health professionals to remotely interpret the data issued from medical monitoring.

As part of the continuous improvement of our product, Implicity conducts research activities on patient data collected through remote monitoring.¹ Collected data may be used for the following purposes:

- Research and development (in particular for the development and validation of algorithms);
- Contribution to the improvement of patient care;
- Medical research;
- Statistical studies.

Our research pursues a clear public interest:

- Patients will benefit from improved patient care by heart specialists for cardiovascular diseases, which are the leading cause of death in the world;²
- Medical teams will save time in the management of their patients, thanks to platform upgrades enabling a more efficient display of available data and offering decision support;
- The health system will benefit from the reduced risk of hospitalization that is associated with the remote monitoring of heart failure patients with cardiac implants.³

Implicity values the protection of patient data. We have declared to the French Data Protection Authority our compliance with the reference methodology MR-004⁴, which sets out the requirements for the processing of personal data for research purposes. In line with these requirements, patient names will not be used for our research. Personal data used for our research will be in a pseudonymized or anonymized form, so that researchers will not be able to link the data to an individual.

Only authorized persons shall have access to your data, among which:

- Professionals involved in the research (and the personnel acting under their responsibility), including Implicity's employees authorized to conduct research;
- Persons responsible for the collection, quality control, processing and analysis of the data;
- Data processors of Implicity, if any;
- Legally empowered health or public authorities (notably public authorities competent for medical devices);
- Independent experts tasked with reanalyzing the data to review research findings, if any.

Personal data used as part of our research will be stored until the completion of the research, and at the latest until the end of the legal period during which competent public authorities may perform complementary analysis on pseudonymized data.

Subject to conditions, you may exercise your rights to obtain the rectification or erasure of your personal data, as well as your right to obtain the restriction of or to object to the processing of your personal data. You shall also at any time benefit from the right to obtain access to the personal data that is processed by Implicity.

	When can you exercise your rights?	How can you exercise your rights?	What are the consequences?
Right to object	Upon implementation of the remote	By telling your doctor.	Your data will not be processed.

¹ Processing is based on the combination of articles 6.f) and 9.j) of the General Data Protection Regulation.

² See https://www.who.int/cardiovascular_diseases/about_cvd/fr/.

³ Mateusz Tajstra & al, EP Europace, Remote Supervision to Decrease Hospitalization Rate (RESULT) study in patients with implanted cardioverter-defibrillator, Volume 22, Issue 5, May 2020, Pages 769-776.

⁴ <https://www.cnil.fr/fr/declaration/mr-004-recherches-nimpliquant-pas-la-personne-humaine-etudes-et-evaluations-dans-le>

	monitoring of your cardiac device.		
Right to object Right to erasure Right to restriction of processing	At any time	By telling your doctor or by contacting Implicity directly at: dpo@implicity.com .	Your data that is already used for a research project will not be erased but no new data collected from your cardiac device will be included in our research.

If you have any question related to the processing of your personal data or if you wish to exercise your rights, please contact our Data Protection Officer at: dpo@implicity.com. By doing so, you acknowledge that our Data Protection Officer may access your personal data to answer your requests. If you are not satisfied with our responses, you may submit a complaint to your Data Protection Authority.