

Patient Information Note V1.112
Remote monitoring of cardiac rhythmic prosthesis

Dear Sir/Madam,

This information note is provided to you as part of the monitoring of your cardiac electronic rhythmic prosthesis, in order to inform you and, if necessary, to allow you to consent with complete transparency to the remote monitoring.

1 In what context is your data collected?

Your data is collected as part of your medical monitoring following the implantation of a cardiac prosthesis and/or the provision of any other electronic device allowing this follow-up.

Remote monitoring does not constitute any form of emergency management but is simply an aid for the monitoring your prosthesis. In case of emergency you should, as usual, contact your physician and possibly call "112".

2 What personal data is collected and processed?

The use by your physician of the Implicity platform implies the collection and processing of your personal data, including health data, and in particular:

- Personal details such as your identity and contact details;
- Health data transmitted by the electronic devices that have been provided to you, such as your cardiac rhythmic prosthesis;
- Data relating to your medical follow-up, including your social security number.

3 For what purposes is your data used?

Use for your medical follow-up and the monitoring of the technical solutions

In accordance with articles 6.1.b and 9.2.h of the UK-GDPR, your health data will be used to:

- Allow the collection and storage of your health data and the data related to your medical monitoring;
- Allow your cardiologist and the authorised care team to use the technical solution provided by the manufacturer of your cardiac device or the Implicity platform in order to access your data;
- Provide the care team with reports and notifications linked to events detected by your electronic device;
- Control and ensure the correct operation of the technical solutions.

Use for research purposes

In accordance with Articles 6.1.f and 9.2.j of the UK-GDPR, your *pseudonymised or anonymized* data will be used for the following purposes:

- Improvement of the performance and functions of the technical solution by its supplier;
- Research and development, including the design of algorithms to calculate the risk of cardiovascular events in patients with cardiac insufficiency or arrhythmia such as acute cardiac insufficiency and atrial fibrillation;
- Contribution to increase of medical knowledge and improve patient care;
- Medical research;
- Retrospective and/or prospective evaluation and research;
- Statistical studies on implantable cardiac devices.

Through your participation, you are likely to benefit directly or indirectly from the results of this work.

4 Who is responsible for the processing your data?

In accordance with the United Kingdom General Data Protection Regulation and the Data Protection Act 2018 (the “Regulation”), the following persons are responsible for the processing of your data:

Processing for the purposes of medical follow-up and monitoring of the technical solutions:

- Your cardiologist and the authorised care team are responsible for:
 - the collection, processing and sharing of your personal data, as data controller;
 - the remote medical monitoring;
 - invoicing the corresponding procedures to health insurance organisations.
- The manufacturer of the technical solution (whose contact details are provided at the end of this note) is responsible for:
 - collecting and processing your personal data in order to ensure the operation, control and maintenance of the solution;
 - invoicing the compulsory health insurance organisations if necessary;
 - the pseudonymisation of your data.

Processing for research purposes:

The health facility in which you are treated and the companies responsible for the remote monitoring solution each act as controllers for the processing operations performed as part of their research activities. These controllers will give you access to specific information about their research project for each new processing activity. In any event, they complete all the necessary formalities required by the relevant supervisory authorities, in accordance with applicable legal and regulatory provisions.

Regarding research activities for which Implicity acts as data controller, further details about the processing of your personal data are available on the following website: <https://www.implicit.com/research-innovation/our-innovation/>.

Each controller identified above may appoint subcontractors who apply sufficient guarantees, especially in terms of confidentiality and security.

5 Who is your data for?

You are advised that your data is intended for use by the authorised healthcare professionals who make up the healthcare team that provides your care and in particular your cardiologist, the company responsible for the remote monitoring solution identified below, and the subcontractors they use for all technical operations relating to your data.

Where applicable, your pseudonymised data is intended for use by the sponsors of health studies and evaluations (authorised personnel), subject to your specific opposition to each study brought to your attention beforehand.

6 Data transfers

Your personal data will be transferred to and stored outside the UK in a secure computer database located in the European Union (where the legislation has been recognized as providing an adequate level of protection for personal data by the UK government).

Moreover, the companies responsible for the technical solutions of remote monitoring may transfer your data in other third countries:

- For the **manufacturer of your cardiac prosthesis**: for the purposes of hosting your data or ensuring the maintenance and continuity of the remote monitoring service;
- For **Implicity, responsible for the technical solution of remote monitoring**: only for the purpose of sending you an SMS. Implicity has set up an application to enable you to inform your physician of the reasons why your cardiac prosthesis is no longer transmitting data on the remote monitoring solutions, or to communicate clinical data useful for your medical follow-

up. In this context, the technical service providers used by Implicity to send these SMS cannot guarantee that your data will be kept within the UK or the European Union. Only your telephone number and the content of the SMS may be transferred in third countries. None of your other personal data will be transferred outside the UK or the European Union when Implicity is acting as a technical monitoring solution.

If your data must be transferred to a third country where the legislation has not been recognized as providing an adequate level of protection for personal data, the necessary security measures and appropriate safeguards will be put in place to ensure the protection of your personal data in accordance with the various applicable laws.

7 **How long is Personal Data kept for?**

Your medical monitoring data, including your remote monitoring data, will normally be kept for twenty years.

Data that must be processed to improve the performance and functionalities of the technical remote monitoring solution is normally kept for two years.

With regard to processing operations carried out as part of a study, evaluation or research, your data is kept for the duration of the research.

8 **What are your rights?**

You have the right to access the information in your file at any time. Under certain conditions, you also have the right to withdraw your consent; to rectify, delete and transfer your personal information; and to object to or restrict its use. You also have the right to communicate your instructions concerning what happens to your personal data after your death.

If you have any questions about the protection of your personal data or if you wish to exercise your rights, you may directly contact your physician or the companies responsible for the technical remote monitoring solution, whose details are given below.

If you consider that your rights have not been respected after contacting the person(s) responsible(s) for the processing of your personal data, you may file a complaint with the data protection authority of your country.

Physician/establishment responsible for remote monitoring of prostheses	Company responsible for the technical remote monitoring solution (manufacturer of prosthesis)	Company responsible for the technical solution (remote monitoring software platform)
Name: Contact details:	<input type="checkbox"/> ABBOTT Telephone: 0 800 000 565 <input type="checkbox"/> BIOTRONIK Telephone: 0 800 801 034 <input type="checkbox"/> BOSTON SCIENTIFIC Telephone: 0 805 540 422 <input type="checkbox"/> MEDTRONIC Telephone: 0 800 381 700 <input type="checkbox"/> MICROPORT Telephone: 0 805 980 041	IMPLICITY Data Protection Officer : dpo@implicity.com

Patient consent form
Remote monitoring of cardiac rhythmic prosthesis

I, the undersigned (Last and First Name) _____,
acknowledge:

- having received and read the information note V1.112 attached to this consent form;
- having received an information note from the supplier of the technical solution concerning the operation and use of the electronic device allowing remote monitoring;
- that the functioning and conditions of use of the remote monitoring, the eventual therapeutic assistance associated with it, and the functioning of use of the electronic device allowing the remote monitoring have been clearly explained to me;
- and that all the questions I have asked have been answered satisfactorily.

I understand the need to attend appointments with my physician and that the success of the treatment performed depends on following the instructions given to me.

I note that my physician may decide at any time to terminate the remote monitoring of my pacemaker as part of my remote medical monitoring. In this case, I will return the transmitter and other electronic devices as soon as possible.

I understand that remote monitoring is not an emergency system.

By signing this document:

- **I agree to the remote monitoring of the electronic device that was provided to me and to the therapeutic assistance (if applicable) under the conditions described to me.** I am aware that I can withdraw my consent at any time and that in this case my medical treatment will not be otherwise affected.

I understand that the remote monitoring of my cardiac prosthesis involves the processing of my personal health data in accordance with the Regulation and under the conditions described in the attached information note.

(Please, if you agree with the following, check the box on the left) :

I agree to my pseudonymized or anonymized personal health data being used for evaluation and research purposes by the care team, the remote monitoring solution providers, and research consortia in which the medical team or the technical remote monitoring solution providers may participate. I understand that I have a “**right to object**” at any time to the use of my personal data for these purposes (to exercise this right, you may contact the persons whose contact details are provided in section 8 of the information note attached to this consent form).

I am aware that the physician may have to contact me and I therefore undertake to inform him/her of any change in my contact information (as noted below).

Place :
Date :

Patient's signature :

Patient's contact information :

Address: _____

PC: _____ City: _____

Landline: _____ Mobile: _____

E-mail: _____

Done in 2 copies, one given to the patient and the other archived in the patient's file

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Date :

Patient’s signature :

<p>Patient's contact information :</p> <p>Address: _____</p> <p>PC: _____ City: _____</p> <p>Landline: _____ Mobile: _____</p> <p>E-mail: _____</p>
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