This DPIA (Data Protection Impact Assessment) is provided as a resource only and is not intended to be used to identify your own risks.

All sites involved in the project will need to complete their own local information governance processes prior to accessing the platform.

Name of the Project

Deployment of my mhealth application(s)

Describe the purpose or aim(s) of the project

myCOPD, myHeart, myAsthma, and myDiabetes (and their derivatives) are a suite of web-based application(s) developed by my mhealth Limited, to support patients to self-manage their condition(s), enabling clinical team members to manage patient populations remotely at scale throughout the entire care pathway.

The aim is to allocate licences to patients diagnosed with one or more of the supported chronic conditions (subject to contracted access), to encourage better self-care away from a clinical setting, through use of the app(s). The my mhealth mission is to improve patient outcomes and reduce healthcare costs by engaging, educating, and empowering patients and enabling clinical teams to deliver new models of care, at a population scale. Healthcare system experience my mhealth have market leading engagement with the NHS, growing users on a monthly basis.

my mhealth have a proven track record of securing grant funding, such as SBRI and Innovate UK, and completing trials generating compelling evidence supporting the use of the platform. Through evidence generation, my mhealth have a range of clinical trial data demonstrating the efficacy of the platform. Such evidence includes i) the online pulmonary rehabilitation has a similar impact to face-to-face programs (and at a far lower cost), ii) users can expect reduced exacerbations/re-admissions to hospital and iii) the correction of over 90% of inhaler use errors.

This is supported by compelling real-world data showing comparable outcomes in our online Cardiac and Pulmonary Rehab to standard offerings, and excellent post market surveillance from numerous independent sources stating users find the platform easy to use, and that they would recommend it to others

Supplier Information

Supplier details

my mhealth Limited

Registered address

Milton Gate
60 Chiswell Street
London
EC1Y 4AG

Registration number

07881370

NHS organisation code

8JH30

DUNS number

218147428

Is the supplier registered with the ICO?

Yes

Registration number:

ZA151364
Expiry month: November (auto renews by direct debit)

Is the supplier compliant with the Data Security Protection Toolkit?

Yes
Last Completed: June 2023 Status: Exceeding Standards
Next required Completion: By June 2024

Is the Supplier DTAC compliant?

Yes

Does the Supplier have any accreditations or certifications?

Yes, please see these below.
Cyber Essentials
https://registry.blockmarktech.com/organisations/GBLTD07881370/
Cyber Essentials
Certificate Number: 20d21c58-21f4-48f5-ae13-47a29c5d66c5
Cyber Essential +
Certificate Number: f1608d39-995e-4ea1-93ff-19ba3e62aecf
DCB0129
Deliverables available on request
ISO 13485:2016
Medical devices — Quality management systems

Does the supplier have the ability to provide single login?

Yes we are enabled via NHS login. All patients can choose to login via a password and username enabled with 2 factor authentication or via NHS login

Does the Supplier appear on any commercial Frameworks?

Yes, DPS Spark, The London Procurement partnership, HSSF, GCloud12 Lot 2

What screening is carried out on new employees / contractors?

All existing and new employees have updated DBS (Disclosure and Barring Service) checks, at a level relevant to their employment.
Contractors sign a data sharing agreement stating that any transmission and use of the data is forbidden and only system operations are allowed.

Does the supplier conduct mandatory security awareness training with all employees?

Yes this is delivered upon induction and Annually at minimum.

Do my mhealth provide set up and ongoing support?

We have a customer support team, customer success and operations divisions to ensure support to customers. The level of support can vary dependant on the chosen package option

Does the supplier have measures in place to ensure continued trade from suffering a disaster?

my mhealth have an embedded disaster recovery plan.

Does the Supplier have information security policies?

Yes. my mhealth information security policies include:
• Encryption of personal data on desktop computers and devices
• Encryption of personal data on storage devices and backup
• Controls against denial-of-service attacks
• Controls against hacking
• Clear Desk and Clear Screen

Does the supplier have a data breach Policy?

Yes.

How will data breaches be reported?

my mhealth Limited will alert the designated contact of a breach. Where applicable, my mhealth will file the breach at NHS / DSPT (Data Security and Protection Toolkit) reporting tool and report to the ICO (Information Commissioners Office).

Does the supplier keep records of all Data breaches?

Yes

Product Information

Category of product

Software as a service (SaaS)

DTAC Assessed?

Yes

Registered with the MHRA (Medicine and Healthcare Research Authority) as a medical device?

Yes Class 1 Reference: 6169 Service example Video examples of the platform can be found on the my mhealth website

Does the platform bear a UKCA marking for quality and safety?

Yes, this can be viewed on the supplier website www.mymhealth.com

Supported web browser versions?

We support the most recent (N) and the two previous (N-2) versions of these browsers unless otherwise indicated. For security reasons we recommend using the latest versions available

	Chrome	Firefox	Safari*	Edge**
Android	✅	✅		
iOS	✅	✅	✅	
Linux	✅	✅		
macOS	✅	✅	✅	
Windows	✅	✅		✅

* WebRTC support in Safari started with Safari version 11
** We support Chromium-based Edge only. Legacy Edge is not supported.

Are any browser plug-ins required?

No additional software is required, such as Flash or Java

Are there any technical requirements to implement the service?

For users:
a) Download the my mhealth app from Play Store or Apple Store; implement the service?
b) Or use their preferred web browser.

For Clinical team members:
Clinical team members may need their network administrator to allow access to:

a) the mymhealth.com domain on the Internet.
b) the Vimeo content delivery network on the Internet. This holds video educational resources utilised by the app

Product Benefits examples

Patients

- Easy-to-follow educational videos to learn how to manage their condition
- Complete online education such as pulmonary rehabilitation courses
- Reports can be generated to show changes in symptoms over a period of time
- Weather and pollution forecasting - Receive an accurate forecast daily to understand how the weather and air pollution in local areas can impact health. Plan the day with confidence
- Notifications to inform patients of medication reminders, to advise of any changes made by their clinician or if their clinical team has sent them a message.

- Medication Management (Medication Diary and My medications) View, add and delete functions. With prescription assessment according to national guidelines. Medications can only be added if condition specific.
- Self-management plan and diary- Know when, and how to take your medication with the online, self-management plan. The patient can also record when they have taken their treatment in the medication diary. This is real time user contributed data that can be viewed in the clinical portal.
- How to use sections- Global guidance on how to use the app, in addition to how-to-use videos available on each function.
- Upload information / photos to support shared decision making e.g., diabetes eyes, kidney and foot care
- Walking- Videos of varying length that a patient is able to follow at their leisure at home
- Activity Diary-Tracking physical and rehab activity. Additional functionality to connect to selected integrated fitness devices via Bluetooth to allow seamless automated data capture

Clinical Team Members

- The clinical dashboard enables clinical team members to deliver self-management, education, inhaler technique training and education courses e.g., pulmonary rehabilitation course on any smartphone or tablet or browser. Each intervention has been shown to deliver the same outcomes as access to a face-to-face education e.g., rehabilitation class and correct 98% of inhaler errors and enables you to manage your patients like never before.
- Real-time patient symptom tracking
- View prescriptions against national guidelines, check medication conflicts and assess overall monthly cost of prescriptions.
- The videos e.g., inhaler videos can be used to update own education or use the video button to deliver education to the user at their community or clinic visit.

System Benefits

- Reducing variations of care
- Increasing resilience of workforce teams
- Supporting patients at home

Network and System Security

Data in transit: Restriction to TLS v1.2 only, using updated, secure ciphers (AES 256 where possible). Known insecure protocols, ciphers and configurations are disabled, e.g., RC4, SSL3, non-perfect-forward secrecy, client re-negotiation. Ciphers utilised for data in transit are: TLS_ECDHE_RSA_WITH_AES_128_GCM_SHA256, TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384

Operational work involving security: systems security patching, internal and external security audits, software quality assurance process and application security updates as part of the software development lifecycle, policies on network configuration, security advisory reviews covering full stack software components, IT staff training on security.

Physical Security

Hosting infrastructure: my mhealth Limited are not permitted to disclose further information on the hosting infrastructure. Please refer to AWS Artefact service to obtain compliance documents under a Non-Disclosure Agreement (NDA).

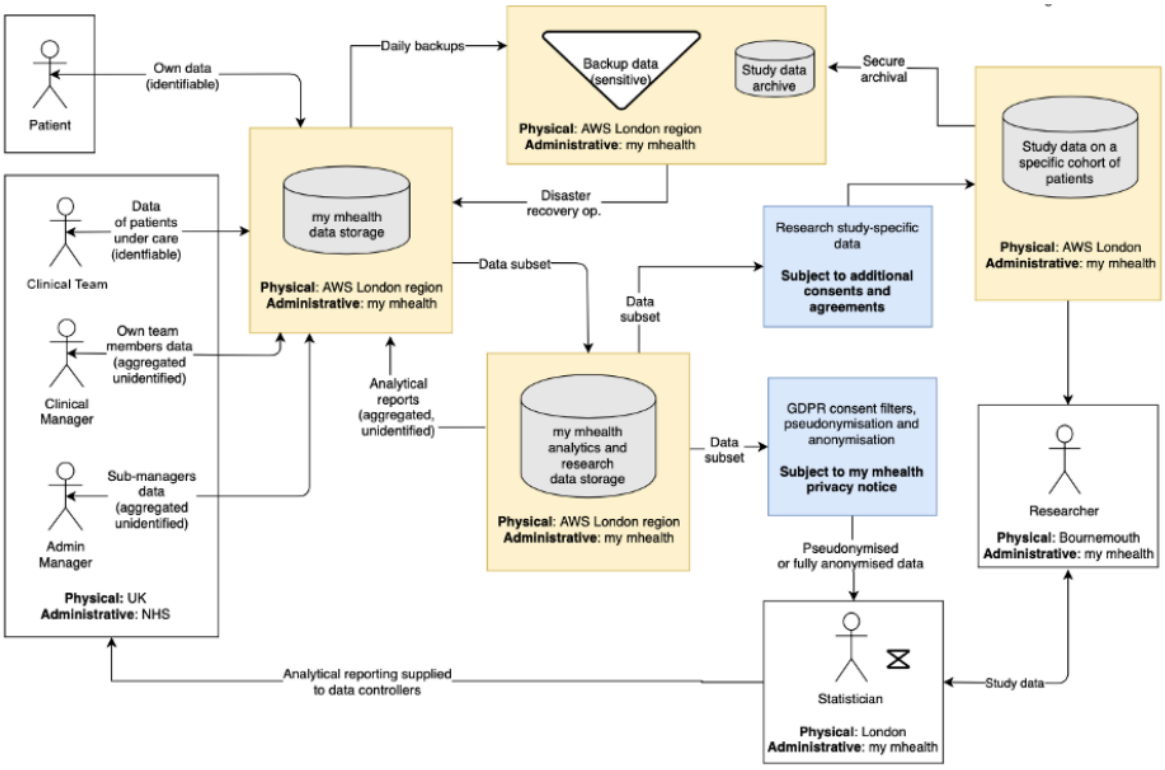
my mhealth operates a fully remote working environment with cloud-based hosting software and therefore have no physical premises. All employees receive cyber security and information governance training annually at minimum, and are governed by a series of homeworking policies and procedures, that include bit not limited to; clear desk policy and acceptable use policy.

Application Security

- Content Security Policy (CSP), secure cookies and HTTP-only cookies are enforced in HTTP communications.
- Authentication cookies are encrypted and salted.
- Passwords are hashed utilising PBKDF2. Incoming data are filtered using OWASP sanitisation at point of reception.
- HTML and application code are disallowed as content in the database.
- Data caching is disabled in web browsers.
- Tokens sent to users expire in 3 hours or when utilised a single time.
- Operational security on the development side includes separation of testing and production environments (including no secrets in source control),
- IT Change Management procedure on information assets including documented procedures for development, functional and non-functional testing.
- Security code reviews are routinely made, and all code changes are logged in a version control system.
- Viruses and Malicious code protection are implemented as a layer approach.
- At data level, the system utilises OWASP components to filter all incoming and outgoing data against malicious code.
- At a deployment level, we regularly review our projects in Dependency Track (https://dependencytrack.org/) and our AWS Elastic Container Registry (ECR) image scanning results and apply fixes as necessary.
- my mhealth maintains its annual assessment for the Cyber Essential Plus certification and completes an annual external accredited Penetration Test on the platform, followed by quarterly vulnerability scans. All identified issues are resolved regardless of their severity.

Data Collection, Processing and Storage

Data collected through the service is to support patients to self-manage their condition(s), enabling clinical teams to manage patient populations at scale for specific long-term diseases. The data flow through the service is demonstrated in the following;



my mhealth have embedded management systems in place to ensure the security and quality of its systems and the data within. All data collected, processed and stored is done so utilising AES-256 encryption in transit and at rest. The transfer of data is via network only Transfer layer Security (TLS) 1.2 only. This includes the transmission of data from the my mhealth interface to the back up and system host (AWS) remote access to infrastructure holding patient data is monitored on a daily basis and the company complies with the requirements for the DSPT and the DCB 0129.

As part of the management systems there are policies for physical access control and mobile work/acceptable use of devices, as well as delivery of sensitive access details. The CLINICAL RISK SAFETY (DCB 0129) is managed by the company's Medical Director, and assured by Safehand and ALL clinical guidance and references within the platform are aligned to NICE (NATIONAL INSTITUTE FOR HEALTH AND CARE EXCELLENCE) or nationally accepted guidelines.

Details on Clinical Safety are outside the scope of this document and can be obtained separately.

PATIENT DATA, BOTH IDENTIFIABLE AND SPECIAL CATEGORY DATA is collected directly from patients using the service. This is entered via an individual account controlled by log in credentials chosen by the user or via NHS Login. There is MULTI FACTOR AUTHENTICATION with an email address and password. (aligning to my mhealth password policy). Clinical team members are also able to add data such as observations and medicine changes following an appointment with the patient.

CLINICAL TEAM DATA is collected by their top level account and clinical manager accounts. Clinical team members are also provided with in an individual account as part of the clinical dashboard, accessed via their email address and their chosen password (aligning to my mhealth password policy). This is enabled with Multi Factor Authentication. my mhealth do not use this data but do incorporate it into aggregated anonymised performance data which is reported back to clinical teams as agreed contractually.

DATA IS STORED within Amazon Web Services LONDON Regions only. A cloud service database cluster over 3 separate locations for fewer down time hours. Each region of our infrastructure is fully partitioned/isolated with availability zones (AZ), to better isolate any issues and achieve high availability. Each AZ (London) has its own power infrastructure and is connected with a fast, private fibre-optic network. Amazon Web Services London are made up of a cluster of TIER-4 connected data centres. Data is not stored outside of the UK boundaries. Data transferred to AWS (Amazon Web Services) is encrypted in transit and at rest and AWS have a series of recognised international standards such as ISO 27001.

They can be contacted on; **Amazon UK Services Ltd**. Patriot Court, 1-9 The Grove, Slough, SL1 1QP, United Kingdom Tel. 0800 496 1081

We use the collected data to:

Provide a Service

This is to be able to give access to the service and to register and manage user accounts. To inform users of any alterations, modifications, and updates to the service and to review, investigate and address issues that may affect the use of our service.

Exercise Legitimate Interest

We will use data to review and assess the quality of our service and make improvements. We need information to provide a responsive service to both patients and healthcare professionals. This can be actioned via the app(s) or via our customer support team.

We will also use information for internal operations. These might include troubleshooting and resolution, data quality checks, functional testing, security, audit and statistical analysis to ensure that our app(s)/service satisfies the requirements of our users. This is through the use of anonymised data only.

To Consent to discussing or receiving information around Research Opportunities

my mhealth participates in research. As part of our privacy policy, (patient) users are asked if they would consent to being contacted and spoken with or receiving information about research opportunities. Users are asked whether they do or do not consent to this via the Opt in/out preference setting. By opting in, users agree to being contacted directly or via the app about research opportunities. By opting out, users are not agreeing to be contacted (and their decision is noted). Users are free to review the information and participate or not without it affecting their access to or functionality of their app.

To respond to Obligatory Requirements

We will disclose information if we are requested to do for a regulatory requirement or in response to a legal request The service is a support tool, for users to record symptoms, learn

more about their condition(s) and improve patient self-management. To do this, information is shared in the following ways:

1. Data back-up services (AWS) are our third-party supplier to back up the information entered into an account. AWS can see identifiable data if they are required by law, otherwise there is no visibility of this data. This is controlled via contractual agreements with AWS.

2. Push notification software providers to communicate medication reminders and updates from healthcare teams. This functionality is to assist the patient to ensure adherence to their medication plans and for clinicians to communicate via the in-app functions.

3. Healthcare & research teams to evaluate the service provided. We will also take part, via our designated research team, where approved by the relevant authorities in assisting with studies, evaluations and medical research. This is to help understand more about the condition(s) and the improvement of future treatments. my mhealth do ask for explicit consent to contact users, either directly or through the provision of material, through this privacy policy (see above) and the Opt in/out preference setting.

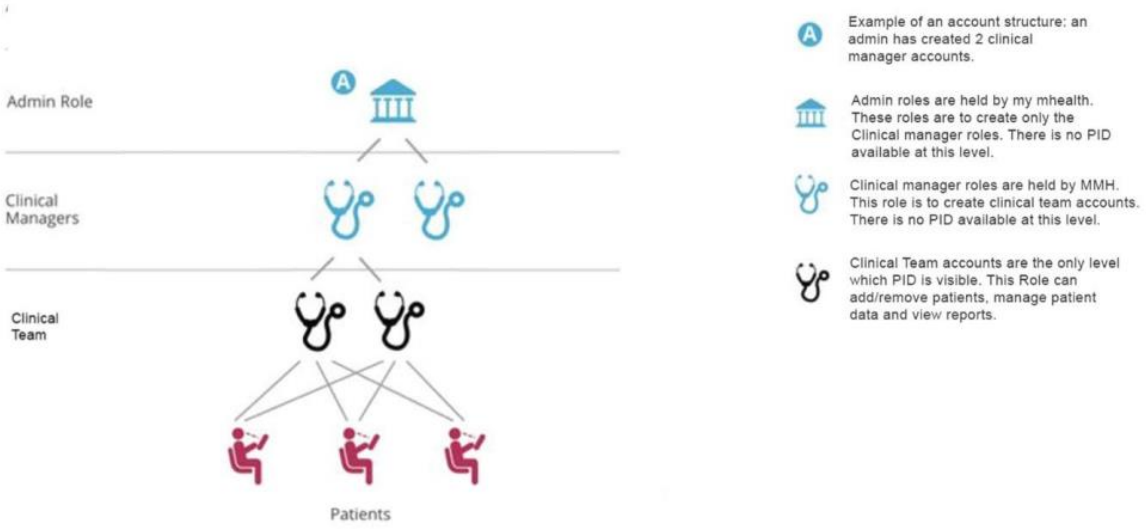
4. SMS messaging services for communicating to/with you, information relevant to your condition(s). These are providers where the healthcare teams have already received prior approval, for the use of these systems.

This is managed by a contract between my mhealth Limited and their customers', which include data governance clauses and a Service Level Agreement (SLA). Sharing of user data is managed by the privacy policy mymhealth.com/privacy
The data collected through the service is personal identifiable and special category health data. This is required for the service to deliver its intended purpose and is limited to the minimal amount needed to use it. Below is a summary covering all disease applications.

FROM PATIENTS (SENSITIVE AND SPECIAL CATEGORY HEALTH DATA): Basic contact details, name, address, symptoms, medication commitment, location (GPS and/or postcode. This can be switched off by the user on their device like any other application), disease details and metrics, research analytics data including video usage, login details, device information (for service evaluation and improvements)

PID (PERSONAL IDENTIFIABLE DATA): Patient's clinician, next of kin and GP contact details. Special category data: Data relating to individuals' health is entered by the patient directly into the system. These are general wellbeing and symptoms relating to users' health.

FROM CLINICAL TEAM MEMBERS (CORPORATE): Name, role, email address, telephone number, organisation, or team name. The service does not require CRIMINAL DATA collection or processing and does not lead to profiling of patients.



The service is intended to be utilised by the patients as a self-management tool at a frequency relevant to the patient. This will naturally depend on their condition, medication, and self-management plan requirements.

The processing of data will be continuous and will scale with the number of patients onboarded to the platform. The Contractual arrangements and the above account set up will control the geographical location of the processed data. my mhealth geographical location will be within the AWS London regions.

Access to Personal and Special Category Data

Patients are able to access their own data. Clinical team members are able to access data of patients under their direct care. Clinical Managers and Top Level accounts are held by our Operations division.

This functionality is to support administrative set up for Clinical teams, reducing time burden. At my mhealth, access is limited to named, designated full-time employees holding contract confidentiality clauses on a need-to-know basis. When dealing with individual enquiries, we will only ever access the minimum information necessary to deliver the service.

ACCESS IS LOGGED IN THE DATABASE. Entry, length of time and activity and the database is backed up to an encrypted back up provider - AWS. The sharing of data is transparent to the user from the onboarding stage. Users are added to the system which triggers an invitation to join the platform. This link presents users with my mhealth Privacy Policy and the Terms and Conditions of use for the service. These have to be read and accepted to before the user is able to move on.

These documents can be found on the my mhealth website or by the following links;

mymhealth.com/privacy
mymhealth.com/terms

Relationships

PATIENT DATA is collected is directly from patients using the service. The application is accessed via an individual account utilising log in credentials chosen by the user, validated by

Multi factor Authentication or via NHS login. Clinical team members are also able to add/amend limited data in the patients' account, such as observations and medicine changes following an interaction with the patient.

There are 3 separate relationships that form part of the service;

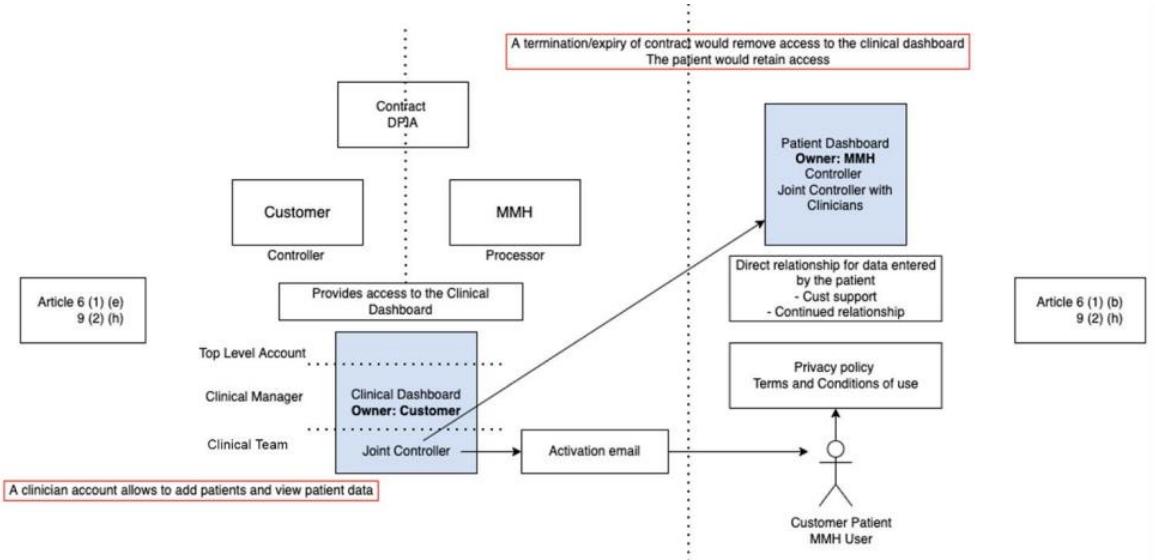
The Relationship between Healthcare Professionals and Users

This relationship will vary based on the healthcare professional's capacity, at the time of data entry. Where data and/or communication(s) are entered into the platform by a healthcare professional, the healthcare professional acts as the DATA CONTROLLER and MMH (my mhealth), as their data PROCESSOR under the controllers' lawful basis for processing, Article 6 (1) (e) and Article 9 (2) (h), when processing special category data.

Where data is entered into the platform by a healthcare professional, on behalf of the patient, where this data would normally be entered by the patient, MMH remain the CONTROLLER of this data (such as, blood pressure or blood sugar readings), to be able to deliver the agreed service.

Where patient data is viewed by the healthcare professional(s), within their clinician account (where access has been provided via the hierarchal flow shown in the previous section), the healthcare professionals assume the role of JOINT CONTROLLER with MMH of the patient/user data entered into the service.

This is shown below:



The Relationship between the Procuring Organisation and my mhealth

This provides customers access to a clinical dashboard, allowing an overview of their patients' care.

For this relationship the PROCURING ORGANISATION is the DATA CONTROLLER for the CLINICAL TEAM MEMBERS information within their clinical dashboard and my mhealth act as their DATA PROCESSOR.

There are contractual arrangements to manage this. MMH will be acting under the healthcare group's lawful basis of processing, as a processor under article 6 1(e) and Article 9 (2) (h), when processing special category data.

Contract expiry between the 2 organisations will revoke access to the clinical dashboard however, the patient will continue to have access to self-manage their conditions without the clinical oversight and MMH will retain data controllership, as outlined within the above relationships.

The Relationship between the End User (patient) and my mhealth

Once the patient accepts terms and conditions and privacy policy the direct relationship and agreement is formed with the user(s).

my mhealth assume the role of the DATA CONTROLLER for the/any PATIENT DATA entered into the platform. The Clinical team members entering patient information into the onboarding page (to provide the patient with the onboarding link) are the DATA CONTROLLER of this information and my mhealth act as their processor, up until the user obtains access to the platform. As the Data Controller MMH lawful basis for processing is 6 1 (b) for the purpose of delivering the agreed service and Article 9 (2) (h) when processing special category data.

We will at times, with certain activities, be acting under Article 6 (1) (f), legitimate business interest as stated in the Privacy Policy. my mhealth are committed to comply with individuals' rights to their information. Individuals are able to exercise their rights under the General Data Protection Regulations.

The privacy policy also provides users with a transparent view of what their information is used for, how it will be processed, and for what duration. Processing of user data is as expected for the service(s) offered and does not include the processing of vulnerable individuals. myAsthma is available to people over the age of 12 years old and the processing of data will be governed by GDPR. This can be viewed in the my mhealth privacy policy. mymhealth.com/privacy

Data Retention

We will keep personal information only for as long as is necessary to fulfil the purpose for which it was originally collected and/or any other permitted linked purpose (including our legal and regulatory obligations).

Our data retention periods are based on our business needs and are in line with established NHS guidelines for long term illness records management. They are regularly assessed to ensure that we do not retain information for longer than is necessary. Personal information will be kept for up to 20 years from last interaction within the platform, or until it is requested that data be deleted, in accordance with NHS record-keeping requirements.

Following the confirmed death of a user, their data will be removed after a period of 10 years, in accordance with medical guidelines.

After 20 years the data will be anonymised in line with article 5 (e) of the of the General Data Protection Regulation UK (GDPR UK) and used only for clinical research or statistical studies. This will not be able to be re-identifiable and scripts are written within the service to trigger the data to be anonymised and archived. All identifiable data is removed from the my mhealth platform at the retention period. All data that has been anonymised in line with Article 5, is stored within the my mhealth insights platform.

Users can opt out of communications and can request to be deleted, where their rights under the GDPR UK allow. We will action these requests via our support team and update users when this has been completed.

This is specifically for 'the right to erasure' as deletion of the application from devices will not delete data within, as per any other app individuals may use. Patients can request edits to their data and clinical team members can also edit limited amounts of data via either a web browser or the my mhealth app, but only for users that sit within their own account structure and not that of users outside of their dashboard. If services are NO LONGER REQUIRED, THE CONTRACT EXPIRES OR IS TERMINATED access to the clinical dashboard will be removed and the data within would be retained in line with the my mhealth data retention policy.

Assess necessity and general FAQs

Does the processing achieve your purpose?

Yes, the applications manufactured by my mhealth have been through trials and evaluations able to demonstrate the benefits of digital innovation within care pathways

What information will you give individuals?

Individuals have access to our support team, the suite of e-learning material and the "how to use" videos present within the applications

How will you help to support their rights?

http://www.mymhealth.com/privacy

What is your lawful basis for the processing?

Purpose	Lawful Basis
To create, register and manage your user account for our app(s) / service(s) *Please note, for this purpose, we will act as joint Controllers with your healthcare team*.	• **Contract performance** • **Legitimate interests**: To allow us to provide you with appropriate content
To inform you of any changes, modifications, and updates to our app(s) / service(s)	• **Legitimate interests**: To ensure that our app(s) / service(s) continue to satisfy the needs of our users
To review, investigate and address issues that may affect your use of our app(s) / service(s)	• **Legitimate interests**: To ensure that our app(s) / service(s) continue to satisfy the needs of our users in a safe and secure manner
To assess and improve the quality of our app(s) / service(s), including via carrying out troubleshooting, data quality checks, functional testing, security testing and statistical analyses	• **Legitimate interests**: To ensure that our app(s) / service(s) continue to satisfy the needs of our users in a safe and secure manner

Purpose	Lawful Basis
To ensure our records are accurate and up to date *Please note, for this purpose, we will act as joint Controllers with your healthcare team*	• **Legitimate interest**: To allow us to provide you with appropriate content
To fulfil our legal, regulatory, or risk management obligations, including our legal reporting and disclosure obligations	• **Legal obligation** • **Legitimate interests:** To co-operate with law enforcement and regulatory authorities
To prevent fraud	• **Legitimate interests**: To ensure that our app(s) / service(s) continue to satisfy the needs of our users in a safe and secure manner
To protect the rights of third parties	• **Legal obligation** • **Legitimate interests:** To co-operate with law enforcement and regulatory authorities
To enforce our own legal rights	• **Legal claims** • **Legal obligation**
To anonymise your data so that you are not identifiable or able to be identified from it, and so that the information cannot be linked back to you	• **Legitimate interests:** To allow us to share non-identifiable data with researchers to help develop better guidelines and treatments for your condition. • **Scientific Research**
To share your information with your healthcare team(s) via our app(s) *Please note, for this purpose, we will act as joint Controllers with your healthcare team*.	• **Contractual performance** • **Legitimate interests:** To allow our app(s) / service(s) to support in the management of your medical condition(s)
To contact you in relation to any third-party clinical study or research trial that may be of interest to you *Please note, you will only be contacted*	• **Consent** (including where this relates to processing of any sensitive personal information)

Purpose	Lawful Basis
where any such study or trial is relevant to your condition(s).	
To contact you in relation to any service evaluation, study, or trial run by my mhealth which relates to our app(s) / service(s) which may be of interest to you	• **Consent** (including where this relates to processing of any sensitive personal information) • **Legitimate interest:** To improve the performance of our app(s) / service(s).
To review your progress through the educational material and courses available within our app(s) / service(s)	• **Contract performance** • **Legitimate interests**: To provide the best content and user experience
To help us understand how you use our app(s) / service(s), and which parts of our app(s) or website are most visited	• **Legitimate interests:** To help manage your medical condition(s)
To comply with legal or regulatory requirements, such as the requirement to disclose your personal information to government, regulatory or law enforcement agencies in connection with enquiries, proceedings, or investigations by such parties. *Please note, where permitted, or unless doing so would prejudice the prevention or detection of a crime, we will direct any such request to you or notify you before responding*	• **Legal obligation**

NHS login terms

Please note that if you access our service using your NHS login details, the identity verification services are managed by NHS England. NHS England is the controller for any personal information you provided to NHS England to get an NHS login account and verify your identity, and uses the personal information provided solely for that single purpose.

For this personal information, our role is a “processor” only and we must act under the instructions provided by NHS England (as the “controller”) when verifying your identity. To see NHS England's Privacy Notice and Terms and Conditions, please click here.

This restriction does not apply to the personal information you provide to us separately

Will reports be generated from this information. If yes, will the information be identifiable or anonymous (will the reports be used for research)?

As part of the evaluations undertaken by my mhealth and its users, reports may be compiled. In this situation, data will not be identifiable. This will consist of insights based on aggregated anonymised data. In the case of Human Research Authority (HRA) approved research, reports written for the purposes of this activity may include identifiable data, but this would be done only under ethical and regulatory approval and with the user's explicit informed consent.

How will you prevent function creep?

Contractual agreements are in place for product(s) that are available for distribution. Training sessions will also cover the relevant product functions

How you intend to ensure data quality?

Data is verified manually by clinical team members and is updated or amended as part of regular visits by the patient. Patients accessing their web app can verify and update their data. On the IT development side, there is source control, unit, integration and regression testing and a management structure signing-off change requests and performing code reviews on any software change that can affect quality and accuracy of data

How you intend to provide privacy information to individuals?

The patient is provided the terms and conditions and Privacy Policy outlining the terms of use of the system and the usage of data. This is required to be read and accepted to gain access to the service. Any changes to the Privacy Policy are notified to each user upon change.

Safeguards for international transfers?

No international transfers are made

Can users request for their data to be removed?

Users can be deleted, where their rights provided under the GDPR allow. We will action these requests when received and update users when this is completed.

This is specifically for ‘the right to erasure’ as deletion of the application from devices will not delete data within, as per any other app individuals may use. Users can contact our Customer Support team - the options to contact us are within the (?) Support symbol at the top of their homepage.

There is also a ‘contact us’ section on our website. Users can also request to delete their account from within their account, through the ‘My Account’ section near the bottom of their homepage

Does the app send any direct electronic messages? Including email text messages or reminders?

The app will send in-app automated reminder notifications e.g., medication reminders. We may also send in-app notifications with information about relevant national awareness days. All users will receive an initial activation email when first registered to the platform and they must follow the instructions in order to set their account up. If the user does activate their account,

they will receive an automated reminder at 7,14 & 28 days. In-app notifications can be toggled off if they no longer wish to receive them

If the organisation/service ceases what will happen to the information?

Patients will have the ability to grant or revoke access to other NHS clinical teams elsewhere in the UK (United Kingdom), so this process does not involve the need of a supplier, IT staff or a specific NHS team to delete the data. Patients will be given privacy controls via their app and will be able to decide what to do with their data regarding my mhealth ceasing activity, specific migration procedures will need to be negotiated before infrastructure decommissioning. It is likely that the information would be made available for download.

What measures do my mhealth implement to prevent unauthorised access to systems from outside of the company?

All data is encrypted in transit and at rest. AWS shield is used for DDoS protection. Content Security Policy (CSP), secure cookies and HTTP-only cookies are enforced in HTTP communications. Authentication cookies are encrypted and salted. Passwords are hashed utilising PBKDF2. Incoming data are filtered using OWASP sanitisation at point of reception. HTML and application code are disallowed as content in the database. Data caching is disabled in web browsers. Tokens sent to users expire in 3 hours or when utilised a single time. A password lockout policy is also in place. We use Prometheus and Grafana to monitor and alert on cluster utilisation so that we can quickly respond to surges in activity.

Alerts are sent to our DevOps team should any of our limits be breached on both. Our cluster is to a large extent self-healing, so it is rare that manual interventions are required. In addition to the automated system monitoring and alerting we preform daily cluster checks which consists of manual and documented checks of the cluster health, dashboards, and logs to pre-empt any potential problems.

Any problems / incidences found are discussed and prioritised after the daily stand-up meeting and actioned accordingly. External Pentest and vulnerability scanning is also in place.

In the event of cloud service termination of contract is there an agreement and demonstration of systems to ensure that data will be transferred to another acceptable location?

We are in full control of our data. In accordance with the AWS customer agreement https://aws.amazon.com/agreement/ they must give us 30 days' notice in the very unlikely event our contract would be terminated.

In the event of cloud service termination of contract is there an agreement and demonstration of systems to ensure that following successful transfer of data that the data will not persist in the original cloud storage?

Yes, please see here

Are there robust systems in place to prevent unauthorised access or unintended / accidental leakage between different customer environments ?

AWS customer accounts are segregated.

How quickly will the cloud provider react if a security vulnerability is identified in their product?

We use AWS Managed Services which provide 24/7 proactive monitoring and incident management. https://aws.amazon.com/managed-services/

Service Level Agreement

The my mhealth Service Level Agreement ("SLA") is a policy governing the availability and IT support of the systems, networks, storage and application services which underlie the Services.

In this SLA:

you: means the Customer.

us, **our** and **we:** means the Supplier, my mhealth.

Office Hours: means 08:00 until 17:00 UTC from Monday to Friday except UK Bank Holidays.

Recovery Point Objective: means the maximum targeted period in which data might be lost from the Service due to a major incident.

Recovery Time Objective: means the targeted duration of time and a service level within which the Service will be restored after a disaster or disruption.

1. Network Service

1.1. We will use reasonable commercial efforts to provide a network service availability with a monthly availability percentage of at least 99.9%.
1.2. Unavailability of this Service means when any of the running application services have no external connectivity.

2. Storage Service

2.1. We will use reasonable commercial efforts to provide availability of storage service at a monthly availability percentage of at least 99.9%.
2.2. Unavailability of this Service means when all of attached storage volumes perform zero read-write IO, with pending IO in the queue.
2.3. Disaster Recovery provisions will match the Recovery Time Objective and Recovery Point Objective of this SLA. These include redundant database nodes and both local and off-site data backups.

3. IT Service Support

3.1. We will monitor the Service 24 hours per day, 7 days per week.
3.2. A team of IT developers/operators will be available during Office Hours to support the Customer and Providers.
3.3. Our IT support contacts are: Office Hours: call +44 1202 299 583 or contact to support@mymhealth.com Out of Office Hours: contact support@mymhealth.com

4. Incident reporting and planned maintenance

4.1. We will notify you of any incident affecting the Service, including Service unavailability, functionality disruption, data loss or systems hacking.
4.2. Although the Service is designed for 24x7 availability, we will inform you at least 24 hours before any planned maintenance activities that potentially or effectively disrupt the Service.
4.3. Notification will be made to an individual or department notified by you to us within 48

hours of an incident occurring. You are responsible for keeping us updated on the designated contact. Please write to support@mymhealth.com

5. Service Recovery

5.1. Upon incident notification by you or an automated monitoring tool, the Recovery Time Objective will be:

a) Two hours for a notification during Office Hours and
b) Eight hours during Out-of-Office Hours.

5.2. The Recovery Point Objective will be 24 hours or less.

6. SLA Exclusions

6.1. This SLA does not apply to availability, quality, performance, correctness or any other issue in relation to the Service in case of:

a) Events that are not directly under our reasonable control, including Internet access to our service and misconfigurations in User's devices
b) Events resulting from actions or inactions of you or any third party
c) Suspension or termination of the Service.

Consultation and Contacts

Head of Compliance: 01202 299 583, Compliance@mymhealth.com
Data Protection Officer / Caldicott Guardian/ Medical Director 01202 299 583, DPO@mymhealth.com
Senior Information Risk Owner (SIRO): 01202 299 583, david.pettigrew@mymhealth.com

Do we need to consult anyone else?

This should be a consideration for all customers to identify any stakeholders needing to be consulted such as (but not limited to); Information Governance Teams GP (General Practitioner) and Clinical Practices Locations where the service is being procured for (regions forming part of an ICB/ICS/ICT for example)

You should consult all relevant internal stakeholders, in particular anyone with responsibility for information security. If you use a data processor, you may need to ask them for information and assistance. Your contracts with processors should require them to assist.