

Data Retention Policy			Page 1 of 5
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Purpose

The intended purpose of this document is to summarise Medisanté's guidelines on data retention and access rights (the development environments are not in the scope of this document).

Please note that this document can become out of date at any time.

Access rights might be granted to the following individuals identified by position within Medisanté and for Users that are granted rights within the M+ hub.

CEO:	chief executive officer
CFO:	chief financial officer
COO:	chief operating office
CTO:	chief technical officer
COP:	commercial operations team reporting to COO
COO:	chief operating office
DIT:	director of IT
SWD:	software development team members reporting to SPD
DPO:	data protection officer
SPD:	software product director (M+ hub)
Global Users:	M+ hub registered users with global rights over all Organisations (Admin role)
Users:	M+ hub registered Users assigned rights by their Organisation Manager(s) or User Manager(s)
Others:	as defined

Data Storage Summary

M+ hub

COMPONENT	SERVICE/DATA DESCRIPTION	PATIENT IDENTIFIABLE DATA	INTENDED PURPOSE	INTENDED STORAGE DURATION Including backup where applicable @ AWS Frankfurt)	ACCESS RIGHTS
Connect (input adapter)	<ul style="list-style-type: none"> Measurement readings Device configuration 	No	<ul style="list-style-type: none"> Receive data Convert data format 	Transit only	n.a. (encrypted data in transit)
Connect (output adapter)	<ul style="list-style-type: none"> Measurement readings Device configuration 	No	Send data in a uniform way	Transit only	n.a. (encrypted data in transit)
Measurement dead letter queue	Measurement readings and device configuration for readings that have failed to be either sent or received	No	<ul style="list-style-type: none"> System resilience Debugging 	Max 14 days	CTO, SPD, SWD
Regular measurement queue	<ul style="list-style-type: none"> Measurement readings Device configuration 	No	System resilience	Max 300 retries (approx. 3 days)	CTO, SPD, SWD
Raw measurement storage (archive)	<ul style="list-style-type: none"> Measurement readings Device configuration Raw (unmodified) device manufacturer data format 	No	Debugging	90 days	CTO, SPD, SWD
Connect (API gateway) log	Whole request, response and related data	No	Debugging	90 days	CTO, SPD, SWD
Connect (input adapter) log	Response codes (error, success etc.) and related data	No	Debugging	90 days	CTO, SPD, SWD
Connect (output adapter) log	Response codes (error, success etc.) and related data	No	Debugging	90 days	CTO, SPD, SWD
IPsec Log	Meta device data	No	Debugging	Indefinite till it gets rebooted	CTO, SPD, SWD
Measurement service	<ul style="list-style-type: none"> Measurements Timestamp Device ID Failed measurements 	No	Measurement storage	Indefinite backup - Point in time recovery for last 35 days, with continuous backup	CTO, SPD, SWD
Device service	<ul style="list-style-type: none"> Device details Device configuration 	No	Device management	Indefinite backup - Point in time recovery for last 35 days, with continuous backup	CTO, SPD, SWD

Device metric service	<ul style="list-style-type: none"> Battery voltage Signal strength 	No	Device management	Indefinite backup - Point in time recovery for last 35 days, with continuous backup	CTO, SPD, SWD
Target system service	<ul style="list-style-type: none"> Authentication Routing configuration 	No	Routing management	Indefinite backup - Point in time recovery for last 35 days, with continuous backup	CTO, SPD, SWD
User service	User details email/name <ul style="list-style-type: none"> User activity Organisation information User roles 	No	User management	Indefinite backup - Point in time recovery for last 35 days, with continuous backup	Global Users, Users
Manage	<ul style="list-style-type: none"> Device dashboard Device information Device configuration 	No	Device management	None	Global Users, Users
Admin	<ul style="list-style-type: none"> User information Organisation information 	No	User management	None	Global Users, Users
Care (Demo System only)	<ul style="list-style-type: none"> Dummy Patient information Dummy Measurement information Dummy Health related information Dummy Caregiver information 	Yes Dummy patients	Display, manage and assign dummy patients in a simulation of an EHR environment to demonstrate how M+ hub works	Indefinite backup - Point in time recovery for last 35 days, with continuous backup	Global Users, Users
Manage audit log	<ul style="list-style-type: none"> Device details Device configuration 	No	Audit	10 years	CTO, SPD, SWD
Admin audit log	<ul style="list-style-type: none"> User information Organisation information 	No	Audit	10 years	CTO, SPD, SWD
Infrastructure audit log	<ul style="list-style-type: none"> Infrastructure changes 	No	Audit	10 years	CTO, SPD, SWD
Care audit log (Demo system only)	<ul style="list-style-type: none"> Dummy Patient information Dummy Measurement information Dummy Health related information Dummy Caregiver information 	Yes Dummy patients	Audit	10 years	CTO, SPD, SWD

Sub processor Vodafone

COMPONENT	SERVICE/DATA DESCRIPTION	PATIENT IDENTIFIABLE DAA	Intended Purpose	INTENDED STORAGE DURATION Including backup where applicable @ AWS Frankfurt)	ACCESS RIGHTS
M2M dashboard	<ul style="list-style-type: none"> SIM card management SIM ICCID, IMSI Cellular Chipset IMEI Country, carrier network, Cell base station ID 	No. Fully encrypted at rest	<ul style="list-style-type: none"> Manage SIM cards Network diagnostics 	According to Vodafone M2M policy	CTO, COO, DIT Vodafone M2M platform managers

AWS server services

COMPONENT	SERVICE/DATA DESCRIPTION	PATIENT IDENTIFIABLE DAA	Intended Purpose	INTENDED STORAGE DURATION including backup where applicable @ AWS Frankfurt	ACCESS RIGHTS
AWS Dashboards	<ul style="list-style-type: none"> Server services management Configurations Accounts Database servers 	No, just internal M+ users	<ul style="list-style-type: none"> Manage the AWS account 	n.a.	Admin: CTO, SPD Limited access: SWD AWS server manager

APPROVAL SECTION

Medisanté Group AG

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Signature: 	Signature: 
Date signed: 10.11.2021	Date signed: 10.11.2021