

1 Data Retention

We receive a number of different types of information about you, including:

- **Your Data:** Your Data is the information that is required when you sign-up for the Activ8lives⁴ Health+Wellness, Asthma+me and Active+me REMOTE Apps and Activ8lives.com site, as well as the information you choose to share.
- **Registration information:** When you sign up for Activ8lives⁴ Health+Wellness, Asthma+me and Active+me REMOTE Apps and Activ8lives.com, you may be required to provide your name, email address, gender, age, ethnicity and other information such as weight, height, activity levels or NHS number.
- **Information you choose to share:** Your information also includes the information you choose to share on Activ8lives⁴ Health+Wellness, Asthma+me and Active+me REMOTE Apps and Activ8lives.com, such as when you post a comment, upload a photo or comment on a friend's post.

It also includes the information you choose to share when you take an action, such as when you add data about yourself.

Your name, profile picture, networks, username, nickname and User ID are treated just like information you choose to make public.

If the user is enrolled on a service provision of Activ8lives⁴ Health+Wellness, Asthma+me and Active+me REMOTE Apps and Activ8lives.com, clinical/nursing/physio/exercise staff may add data to the users record and this should be retained as part of the users healthcare records, which have varying lengths of retention, for up-to-date guidance on retention periods for different types of health and social care see the "NHS^x Records Management Code of Practice 2021, August 2021" https://www.nhsx.nhs.uk/media/documents/NHSX_Records_Management_CoP_V7.pdf.

2 Other Information we receive about you

We also receive other types of information about you:

- We may receive data about you whenever you interact with Activ8lives⁴ Health+Wellness, Asthma+me and Active+me REMOTE Apps and Activ8lives.com, such as when you look at another group's profile, send someone a message, click on an ad or purchased Activ8lives products.
- When you post things like photos or videos on Activ8lives⁴ Health+Wellness, Asthma+me and Active+me REMOTE Apps and Activ8lives.com, we may receive additional related data (or metadata), such as the time, date and place you took the photo or video.
- We may receive data from the computer, smartphone, tablet or other device you use to access Activ8lives⁴ Health+Wellness, Asthma+me and Active+me REMOTE Apps and Activ8lives.com. This may include your IP address, location, the type of browser you are using, Bluetooth devices you are connected to, type of smart device and operating system.
- We do not store credit card details, nor do we share customer financial details with any third-parties.

Aseptika requires the patient's/user personal information's, hospital and NHS numbers so that they may submit reports containing data they have collected to the hospital's Electronic Document Management System (EDMS). The hospital and NHS number are used by the EDMS to place the report into the correct patient record. The NHS and hospital number are entered by the patient or

on behalf of the patient during the registration and setup process. The NHS and hospital number are confirmed for accuracy by the clinician or research professional within the Aseptika Clinical Portal prior to any reports being submitted.

The information is held as part of the patient's account within the Aseptika system, for as long as user/patient require. The patient/user is able to remove the data themselves or request a full deletion by Aseptika.

3 Data Disposal

- The ASL IG P-021 Privacy and Cookies Policy published on the website outlines the method by which the user can request deletion.
- The user sends a message to request deletion to Aseptika.
- The message is received by an Aseptika General Contact email.
- Aseptika will need to ascertain if the information to be deleted is information that is collected under special purposes, e.g. healthcare data or where the user is asking for marketing data is to be deleted. **Note:** If the user has purchased a medical device from Aseptika, we need to maintain the record of purchase of a medical device for 10 years or the lifetime of the medical device for regulatory purposes of recalls and field safety actions. If we have sent information to someone about products or our company, where they have previously provided us with consent, then this user has the right to be forgotten and their PII deleted.
- An appropriate person within Aseptika replies to the message to confirm that the user understands that the account will be removed and will not be recoverable.
- Once confirmed, Aseptika personnel (three authorised staff only) access the admin console for the Activ8rlives.com site.
- The user's account is looked up in the admin console.
- Aseptika may store data for longer periods if the personal data is to be processed solely for archiving purposes in the public interest, scientific, historical research purposes, statistical purposes and regulatory support, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject. See ASL IG P-032 Anonymisation of Data for this procedure.
- See ASL IG P-008 Record Retention Procedure for the retention periods, justifications for keeping data and how this information is to be destroyed or archived.

4 References

ISO/IEC 27001:2022	Information security, cybersecurity and privacy protection — Information security management systems
BS EN ISO/IEC 27701:2021	Information Security Techniques - Security techniques - Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management
ISO 27033-6 IEC/EN 2016	Information technology — Security techniques — Network security — Part 6: Securing wireless IP network access
ISO/IEC 27001:2022	Information security, cybersecurity and privacy protection — Information security management systems
BS EN ISO/IEC 27701:2021	Information Security Techniques - Security techniques - Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management
WCAG 2.1	Web Content Accessibility Guidelines 5 June 2018
NHSx DTAC	Digital Technology Assessment Criteria

NHS	The Information Security Management: NHS Code of Practice April 2007
NHS DSPT	NHS Data Security & Protection Toolkit
Cyber Essential	Cyber Essentials & Cyber Essentials Plus
ICO.org	Personal data breaches: Information Commissioners Office
ICO.org	The Information Commissioner's Office (ICO) Guide to Data Protection
MDCG 2019-16 Rev.1	Guidance on Cybersecurity for medical devices

5 Document History

Version	Date	Authors Initials	Reviewers Initials	Changes from Previous Version	Authorised by & date
1.0	06/03/2019	ETRA	CB	First Version as per CC2019-017	
2.0	02.12.2019	JA	MP	MDR Transition update, part of CC2019-057	CAA
3.0	23.11.2021	JA	GE	Annual review CC2021-075	Kevin A Auton 23.12.2021
4.0	07.03.2022	JA	GE	Change language CC2022-018	Kevin Auton 18.03.2022
5.0	24.06.2022	JA	GE	Update policy CC2022-041	CAA 04.07.2022
6.0	28.10.2022	JA	GE	Migrate to AWS CC2022-063	CAA authorise JA 02.11.2022