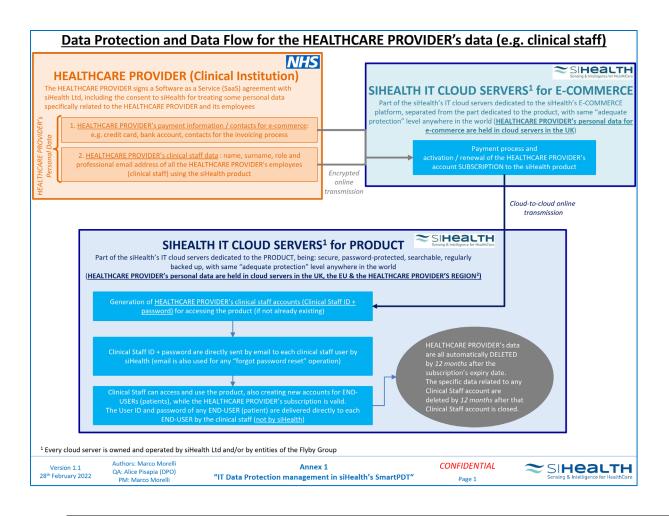
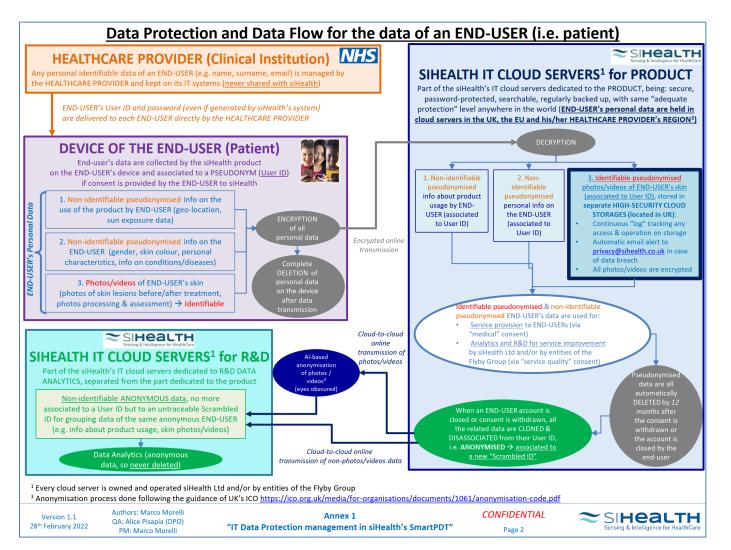


SCHEDULE 7 – IT DATA PROTECTION MANAGEMENT IN SIHEALTH'S SMARTPDT









² Regions used for the IT cloud data storage by siHealth Ltd and/or by entities of the Flyby Group

#	Region of the Healthcare Provider	Location where the IT cloud data of the Healthcare Provider (Clinical Institution) and of its associated End-Users (Patients) are actually stored
1	North America	UK and/or US, in full compliancy to the EU GDPR
2	South America	UK and/or Brazil, in full compliancy to the EU GDPR
3	UK	UK, in full compliancy to the EU GDPR
4	Europe (without UK) & Middle East	UK and/or Germany, in full compliancy to the EU GDPR
5	Asia	UK and/or South Korea, in full compliancy to the EU GDPR
6	Africa	UK and/or South Africa, in full compliancy to the EU GDPR
7	Australia & New Zealand	UK and/or Australia, in full compliancy to the EU GDPR

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Consent acquisition and management for the END-USER (Patient)

- No need of any signature by the END-USER, it's legally sufficient to receive just a <u>digital confirmation of the consent managed then</u> <u>directly by siHealth Ltd⁴</u> (see UK's ICO documentation https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/consent/how-should-we-obtain-record-and-manage-consent/)
- At the first login in the siHealth product (e.g. app), the user has to:
 - 1. Voluntarily (tick box) provide the explicit consent to the Consent Form, otherwise no use of the product allowed
 - 2. Voluntarily (tick box) accept the Terms of Use (EULA), otherwise no use of the product is allowed
- Any photo/video should be made non-identifiable (anonymised) in the siHealth's back-end after the END-USER stops to use the siHealth's product, following the related guidance https://ico.org.uk/media/for-organisations/documents/1061/anonymisation-code.pdf
- The siHealth product (e.g. app) includes in the menu:
 - o a hyperlink to the siHealth product's Privacy Policy → to be shown and accepted by the user at first login
 - o a hyperlink to the **siHealth product's Consent Form** → to be accepted by the user at first login (at least for the mandatory consents), but the **consent could be withdrawn anytime** by the user (losing the access to the product)
 - o a hyperlink to the siHealth product's Terms of Use (EULA) → to be accepted by the user at first login

