CENTRO INTERNAZIONALE RADIO MEDICO - CIRM

CIRM respect your concerns about privacy. References in this document to CIRM, “we”, “us”, and “our” are references to CIRM entity responsible for collecting and processing your personal information.

This Privacy Policy describes the types of personal information we obtain, how we may use that personal information, with whom we may share it and how you may exercise your rights regarding our processing of that information. The Privacy Policy also describes the measures we take to safeguard the personal information we obtain along with our contact details.

This Privacy Policy applies to the personal information we obtain through CIRM properties, including websites, products, services, desktop and mobile apps and other tools offered by CIRM; offline collection including CIRM interactions, surveys, questionnaires and evaluations (“Offline Channels”); and third-party sources including related partners involved with service delivery (collectively, the “Offerings”).

In connection with providing support, tele-support and other services, CIRM processes certain data maintained in the environment that it may access to perform tele-consultation, support services and research and analytics (“Customer Content”) on behalf of and at the direction of its customers and partners, as well as log data (e.g., regarding access and authentication requests) that they collect for analysis and security purposes across our services. Our use of Customer Content and Log data is driven by our Customer Agreements and not governed by our Privacy Policy.

The information we collect through our customers and partners’ use of our platforms (such as names, address, employee details etc.) and through our offline interactions with customers and partners is subject to this Privacy Policy.

Our co-branded offerings in which a third party is involved, we will sometimes share or jointly collect customer data related to those transactions with that third party.

Version History

Version No.	Date	Changes	Signed Off By
1.0	1/11/2017	n/a	Saturnino Andrea
1.1	1/4/2018	Defining the data integration and data flow in application and connected systems.	Saturnino Andrea
1.2	15/5/2018	GDPR insertions, update of Privacy Policy, Change in Data Security Measures etc.	Saturnino Andrea

Sections:

A. Introduction to Health MAP
B. Features of Health MAP
C. Consent for accessing to review seafarer health passport
D. How it works.
E. Data
    a. How is the data processed?
    b. Journey of the data?
    c. How is the data protected?
    d. Do we share your information?
    e. Data Security Check-list
F. GDPR Privacy Policy
    a. GDPR Compliance Review

Introduction

CIRM uses a dedicated application to record, manage and track the medical requests received from vessels.

This application integrates with the other applications to provide a seamless connected healthcare framework for the customer.

At the time of a Medical Request, the following form (Annexure 2.1) can be used by Captain to capture the basic information required for the doctor to make an informed medical recommendation.

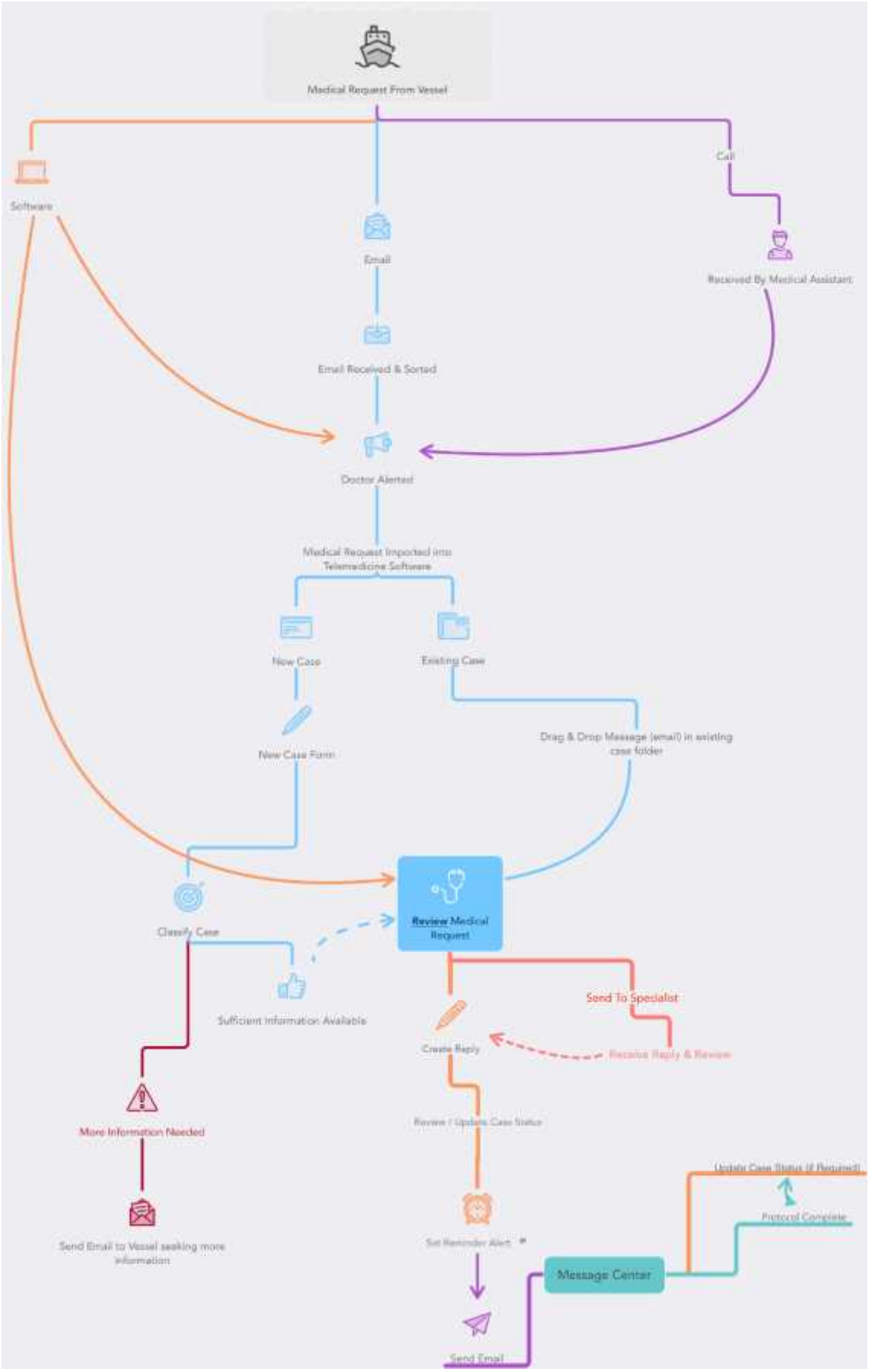
Features of the System:

1. Automatically sort incoming Medical Request (email) from the Vessel
2. Once the vessel is automatically sorted the Medical List (based on the Flag State and information provided) is visible to the Doctor on duty.
3. Medical Request Form serves as a guideline for Captains to ensure all relevant information is captured in the first instance. This helps quicken the response time.
4. Seafarer requiring medical assistance is easily identified by using the SHP ID which is captured in the Medical Request.
5. All correspondence on the medical event is captured in the system. This is extremely helpful if P&I documentation is required and also increases transparency of service being provided.
6. All medical events are classified by WHO – ICD 10 codes which provide basis for analysis and health prevention initiatives later.
7. Auto reminders for follow-up.
8. Secure system with all required Data Protection Protocols and settings to comply with required regulations.

Consent for Viewing Seafarer Health Passport

The SHP is only viewed at the time of a medical event pertaining to that individual. Consent to review, share (if necessary) for providing medical recommendation at the time of an event is sought at the time of signing up for the Health Passport service (Annexure..)

How it works?


Medical Request From Vessel
Software
Email
Call
Received By Medical Assistant
Email Received & Sorted
Doctor Alerted
Medical Request Imported into Telemedicine Software
New Case
Existing Case
New Case Form
Drag & Drop Message (email) in existing case folder
Classify Case
Review Medical Request
Sufficient Information Available
Send To Specialist
Create Reply
Receive Reply & Review
More Information Needed
Review / Update Case Status
Update Case Status (If Required)
Protocol Complete
Send Email to Vessel seeking more information
Set Reminder Alert
Message Center
Send Email

Technology

The Health Map is accessible only to the CIRM Doctors who will be replying to the medical requests from the ship. The application is run locally in CIRM premises, remote access from Doctors is only possible via secured VPN.
The Data base is housed at CIRM Premises and complies with relevant regulations.

Data Protection

How is the data processed?

Most information that enters the system is automatically sorted by the intelligent system.

How we protect data?

We maintain administrative, technical and physical safeguards, consistent with legal requirements where the personal information was obtained, designed to protect against unlawful or unauthorized destruction, loss, alteration, use or disclosure of or access to, the personal information provided to us through the channels.

Do we share your information with third parties for Marketing or other commercial activities?
NOT AT ALL. The information collected is purely for providing Medical Support services to the seafarers. Data is pseudonymized for research and analytics.
However the data can be shared with specialist for seeking medical assistance for medical event involving the individual.

Platforms Summay

Health Passport	EASY CIRM	ARCHIV.	HEALTH MAP
User: Individual Seafarer	User: CIRM | Company	User: CIRM |	User: CIRM ONLY
Access: Online + USB	Access: Online + Local Installation	Access: Online + Local Installation	Access: Closed Platform for CIRM only.
Security: Username & Password	Security: Username & Password	Security: Username & Password	Security: Username, Password, 2FA, Secure VPN, restricted IP and MAC Address access
Data Location: Physical Server at CIRM	Data Location: Physical Server at CIRM	Data Location: Physical Server at CIRM	Data Location: Physical Server at CIRM

Software Security Checklist

Are domain names secured	Yes	
Make sure critical services are secured?	Yes	
Make sure email is secured	Yes	
Do you share wifi	No	
Are your non-tech employees connected on same server as Tech employees?	No	
Have a public security policy	Yes	
Have an internal security policy	Yes	
Have a security incident response plan	Yes	
Is everyone trained on best practices for data security?	Yes	
Is 2 Factor Authentication used in your services?	Yes	
Does team lock their machines while away?	Yes	
Are accounts or computers shared?	No	
Use Centralized account management	Yes	
Do you use SSL for your website / online applications	Yes	
Do you review basic website / online security	Yes	

Are Regular back-ups taken	Yes	
Restrict internal services by IP addresses (ISP, VPN etc.)	Yes	
Keep a list of servers	Yes	
Watch for unusual patterns in your metrics	Yes	
Protocol on how to redeploy infrastructure from scratch	Yes	
Is there are code review checklist	Yes	
Use a static security code analysis tool	No	Our platform and code already use advanced security mechanisms including encryption.
Maintain backlog of security concerns in your issue tracking tool	Yes	
Use a secure development life cycle	Yes	
Application Check		
Run it unprivileged	Not Applicable	Browser-based application.
Monitor your dependencies	Yes	
Use real-time protection service	Yes	
Hire an external penetration testing team	No	
Enforce a password policy	Yes	
Monitor users suspicious activities	Yes	

GDPR Privacy Notice (Internal)

As this is an internal application.

Obtaining personal information

We will collect and compile your personal details, including name, address, next of kin, records of appointments, visits, e-mails, telephone calls, your health records, treatment and medications, test results, X-rays, etc. and any other relevant information which will enable us to deliver effective medical care.

How we will use your information

Your data is collected for the purpose of providing direct healthcare services; however, if required by law, we can disclose this information, provided you give consent or is justified in the public interest. Public interest includes the safety of the other crew onboard. Our effort to provide health statistics and trends will involve using your medical data anonymously. This will also be subject to your consent and other laws. The data may

include demographic data, such as date of birth, and information about your health which is recorded in coded form; for example, the clinical code for diabetes or high blood pressure. Processing your information by obtaining your consent ensures that we comply with Articles 6(1)(c), 6(1)(e) and 9(2)(h) of the GDPR.

Maintaining confidentiality and accessing your records

We are committed to maintaining confidentiality and protecting the information we possess about you. We adhere to the General Data Protection Regulation (GDPR).
Seafarers have a right to access the information we possess about them, and if they wish to access this information, they will need to complete an Applicant Access Request (AAR) form which will give them access to the Health Passport wherein all the information can be found. Furthermore, should the seafarer identify any inaccuracies, he/she can correct the inaccurate data by contacting us.

Risk stratification

Risk stratification is a mechanism used to identify and subsequently manage those seafarers deemed as being at high risk of requiring urgent or emergency care. Usually this includes patients with any chronic or long-term conditions. Seafarers information is collected by a number of sources, including information shared by the employer, recruiting doctor etc.; this information is processed electronically and given a risk score which is saved along with the information to ensure that you receive the most appropriate care in the Golden Hour.

Invoice validation

Seafarer information can be shared for invoicing and billing purposes to Employer and Employee. This information will include your name, address and treatment or appointment date. All of this information is held securely and confidentially and will not be used for any other purpose or shared with any third parties.

Retention periods

In accordance with general practices, seafarer healthcare records will be retained for 10 years after his/her's death, or if the seafarer migrates from our service, for 10 years after the date of migration from our service.

In case of questions

Should the seafarer have any questions about our privacy policy or the information we hold about them, they can contact the data controller via email at datacontroller@cirmservizi.it.GP practices are data controllers for the data they hold about their patients.

Complaints

In an unfortunate event that you are unhappy with any element of our data-processing methods, we encourage you to write to the data controller at the same address mentioned above.

Changes to our privacy policy

We review our privacy policy periodically and any updates will be published systematically.

GDPR Compliance Review

Review		

Is informed Consent taken for storing individual information	Yes	
Do we have a legal basis for storing the information?	Yes.	
Do we have adequate security measures in place for data safety?	Yes	
Have we appointed a Data Protection Officer and Controllers ?	Yes	
Is the staff trained with requirements of GDPR?	Yes	
Do you have a continuous review protocol for security, data stored and handling customer requests?	Yes	

ANNEX – MEDICAL REQUEST FORM:

CENTRO INTERNAZIONALE RADIO MEDICO (C.I.R.M.)

Modulo Di Assistenza Medica (Medical Assistance Form)

CENTRO ITALIANO RESPONSABILE DELL'ASSISTENZA TELEMEDICA MARITTIMA (T.M.A.S.)

The international Radio Medical Center (C.I.R.M) is the Italian Telemedical Maritime Assistance Service (TMAS). Our Mission is to provide round the clock free telemedical assistance to patients onboard ships flying any flag of any nationality all over the world.

We suggest contacting C.I.R.M promptly in all cases of ill or injured persons, possibly before any treatment. This to avoid complication of pathologies or modifications in their course by inappropriate treatment.

A Quick way to get in touch with us is to fill the form below and email it to us at telesoccorso@cirm.it. Alternatively you can call us at +39 06 59290263 keeping all the below information handy.

VESSEL INFORMATION

NAME	**INTERNATIONAL CALL SIGN**
FLAG STATE	**VESSEL TYPE:**
POSITION OF VESSEL	**PORT OF DEPATURE**
PORT OF DESTINATION	**EXPECTED DAYS TO DESTINATION**

SEAFARER INFORMATION

NAME	**DATE OF BIRTH**	**RANK**
HEALTH PASSPORT ID:	**NATIONALITY**	**DO YOU HAVE TECHMED KIT?** ◯ Yes ◯ No
TYPE OF MEDICAL EVENT: SELECT	**DATE FIRST REPORTED:**	**DATE OF PREVIOUS MED CONSULT:**
MEDICAL COMPLAINT DESCRIPTION (Describe the symptoms, location of pain, associated symptoms etc. If it is an accident mention how and where the accident took place?)		
PERSONAL MEDICAL HISTORY (Mention any other medical problems of the patient with special reference to drug or other allergies, chronic illness medications etc.)		
Any other Relevant information:		

VITALS

BLOOD PRESSURE	**PULSE**	**BODY TEMPERATURE**
ANY OTHER READINGS		

SUBMIT CLEAR

Helpful Tips:

1. Keep the medicine chest always up to date. Ensure compliance with Flag State. If possible do not administer any medicines before consulting C.I.R.M or qualified doctor.
2. The TechMed Kit is an essential Kit with required medical devices that are integrated on a platform which is helpful when seeking Tele-Medical support.
3. Comply with FLag States first and also with the CIRM List, this will be helpful when seeking Tele-Medical support.

Medical Assistance provided by C.I.R.M is FREE OF CHARGE.
Make a donation to support our efforts in providing medical care to all seafarers.
Bank Details:
BANCA NAZIONALE DEL LAVORO
IBAN: IT69Z0100503382000000211280, CIN: Z, SWIFT BIC: BNLI I TRR
OR VIA PAYPAL