

## PROTECTION OF PERSONAL DATA

### PATIENT INFORMATION

#### **DATA CONTROLLER:**

The Monaco Cardiothoracic Centre (hereinafter referred to as CCM), located at 11 bis avenue d'Ostende, 98000 Monaco, processes your personal data as data controller and undertakes to ensure its protection, confidentiality, and security in accordance with the legislation in force in the Principality of Monaco (Law No 1.565 of December 3, 2024 on the protection of personal data).

The purpose of this Information Notice is to describe the conditions under which your personal data is processed in the context of your care, and the conditions under which this data may be reused in the context of health research.

The CCM reserves the right to modify this document at any time. Any modification will take effect immediately and will be updated accordingly.

#### **PURPOSES OF PROCESSING:**

The collection of your personal data as a patient of the Monaco Cardiothoracic Centre is necessary to meet the following purposes in particular:

- Organizing your pre-admission
- Managing your medical appointments
- The creation of your medical file in order to manage your care at the CCM
- Computerized medication management
- Management of your anesthesia file
- Management of your biomedical data on monitoring stations
- Managing your administrative file and billing
- The management of hospital activity
- Taking meal orders for inpatient services and dietary monitoring
- Evaluation of satisfaction surveys, for example via questionnaires
- Management of telephone services
- Managing the allocation of access codes for the CCM's public Wi-Fi
- Compiling statistics to contribute to the CCM's strategy for improving care and management
- Public interest missions, such as research.

Your health data is centralized in a confidential electronic medical record, which allows us to monitor your progress, ensure continuity of care, and guarantee that you receive treatment appropriate to your state of health. The CCM does not process any of your data for purposes incompatible with those for which it was collected, unless you have given your prior consent.

No personal data is used for automated decision-making or profiling purposes.

#### **LEGAL BASIS:**

The CCM collects personal health data on the following legal bases:

- ✓ Legitimate interest;

- ✓ Safeguarding vital interests;
- ✓ Performance of a contract or pre-contractual measures;
- ✓ Compliance with a legal obligation;
- ✓ Consent, if applicable;
- ✓ Obtaining consent, if applicable, for one or more specific purposes of the data subject.

### **CATEGORIES OF PERSONAL DATA:**

Depending on the needs related to your care, the CCM collects various types of personal data:

- Administrative data: identity and family status (last (name(s), first name(s), social security number, etc.), addresses and contact details, electronic identification (email address, etc.)
- Health data: for example, medical history, reasons for consultation, reports or test results
- Medico-social data: for example, lifestyle, profession
- Biological samples: samples are taken at the CCM and then transferred to an external laboratory; they are not stored.

The personal data of trusted individuals, persons to be notified, or other accompanying persons, legal guardians, tutors, etc. are also collected:

- Administrative data: identity and contact details
- Health data if this proves useful for the patient's care: family history in particular.

### **RETENTION PERIODS:**

Your data is kept by the CCM for the time necessary to achieve the purposes set out above, in accordance with the legal retention periods in force, the legal limitation periods, and the recommendations of the APDP (Monaco) and the European authorities.

Health data is stored on our secure servers for the duration of your care and, except in cases where the law provides otherwise, for a maximum of twenty years from your last visit to the CCM.

### **RECIPIENTS OR CATEGORIES OF RECIPIENTS:**

Your personal data is accessible to CCM healthcare professionals who need to know it for your care.

Certain data is made available to administrative, logistics, and IT departments with appropriate restrictions on access rights.

The transmission of your data to authorized third parties may be necessary for the continuity of your medical and administrative care (healthcare establishments, laboratories, social security funds and complementary organizations, insurance companies).

As part of their duties, and subject to a confidentiality obligation, third-party service providers and IT tool suppliers working on behalf of the CCM may also have access to some of your data.

Finally, if you do not object to research, your data may be transferred to our research partners, whether industrial or academic, located in Monaco, within the EU, or outside the EU.

Any transfer of your personal data is carried out within the Principality of Monaco or to a country with adequate protection (e.g., the EU). Safeguards are put in place if certain data is transferred outside the European Union.

## DATA SECURITY:

When the CCM collects personal data, enhanced technical, physical, and organizational security measures are applied to ensure the security and confidentiality of your data.

Access, storage, and hosting of data are protected and controlled, and regular backups are performed.

The CCM is committed to integrating personal data protection from the design stage of any project, service, or other tool related to the handling of personal data, including limiting the purposes of data collection, minimizing personal data, security, and respect for data integrity and confidentiality.

In the event of a personal data breach, i.e. a security incident that compromises the integrity, confidentiality, or availability of your personal data, the CCM is committed to assessing the risk and recording any breach in a register. If the risk is considered high, you will be informed as soon as possible.

## ACCESS TO YOUR MEDICAL FILE:

Under certain conditions, you have the right to access, obtain information about, correct, and restrict your medical records. Please note that the CCM is legally required to create medical records as part of your care at its facility, in accordance with Monegasque law. In this context, the rights to object and erase do not apply.

Exercising these rights will have no impact on your care.

### ➤ Special cases:

A minor may object to a doctor disclosing information about them to their parent or guardian. The doctor shall make a written note of this objection.

The beneficiary of a deceased person may access information concerning the deceased to the extent that such data is necessary to determine the cause of death, defend the memory of the deceased, or assert rights, unless the deceased person has expressed a contrary wish. The beneficiary must indicate the reason for their request for access.

Requests by third parties: In the context of a judicial assessment, the judge may instruct a medical expert to consult the medical file of the patient involved in the proceedings. However, the expert may not disclose the file to any other third party.

To exercise your rights of access to your medical file, the request must be sent in writing to the management of the establishment.

Before disclosing any part of your file, the CCM will verify the identity of the applicant. To this end, the request must be accompanied by the following:

- ✓ your precise identity, or that of the applicant if you are not the originator of the request
- ✓ a copy of your photo ID, and also that of the applicant if you are not the one making the request
- ✓ a copy of the power of attorney you have drawn up in the name of the applicant, if you are not the person making the request
- ✓ a list of the documents in the file for which a copy is requested.

Access to the data is granted, according to your choice, either by consultation on site with the possibility of copies being provided, or by sending the documents, a copy of the complete file or certain documents. You may be required to pay the costs of issuing these copies.

The heirs and successors of a deceased person may also request access to their medical file, accompanied by the following:

- the precise identity of the applicant,
- proof of status as heir or successor,
- a list of the documents in the file for which a copy is requested,
- the reason for the request.

The deadlines for providing medical records are as follows after receipt of the complete request:

- Within 15 days if the medical information is less than 5 years old,
- Within 2 months if the medical information is more than 5 years old.

### **RIGHTS REGARDING PERSONAL DATA:**

In accordance with current legislation on personal data, you have the right to information, access, rectification, erasure, restriction, and portability. You also have the right to object to the processing of your personal data.

To exercise your rights regarding your personal data, you can also contact the CCM's data protection officer:

- By email at: [dpo@ccm.mc](mailto:dpo@ccm.mc)
- Or by post: Data Protection Officer  
Monaco Cardiothoracic Centre  
11 bis avenue d'Ostende  
98000 MONACO

All requests must specify the reason for the request (exercise of the right of access, opposition, etc.) and the address to which the response should be sent. Proof of identity may be requested.

The CCM will send you its response within a maximum of one month from the date of receipt of your request.

### **SPECIFIC INFORMATION ABOUT YOUR RIGHTS REGARDING THE USE OF YOUR HEALTH DATA FOR MEDICAL RESEARCH:**

#### **➤ Internal research on health data**

The data collected by the CCM is used to carry out research aimed at improving diagnostic and therapeutic skills and the quality of care. In accordance with the principle of data minimization, only data that is essential and strictly necessary for the defined research is collected. The CCM's research department, represented by authorized persons, is responsible for managing and processing this data.

The data is reused after treatment without the need for additional medical consultation or action on your part. This research on health data allows studies to be carried out on a much larger number of patients and is therefore of great value.

The data is pseudonymized or anonymized and, in this format only, may be shared with external partners involved in the research. The processing of the data does not allow for re-identification outside of the healthcare team that treated the patient.

➤ **Clinical research**

Clinical research refers to scientific studies conducted on humans with a view to advancing biological or medical knowledge. This is prospective research, which involves monitoring patients and/or volunteers.

The CCM's mission is not to undertake this type of research, but it may participate in or serve as a site for clinical trials as part of specific research projects. In this case, the CCM follows a specific protocol provided by the sponsoring institutions, and adequate information is communicated to patients entering the study.

If you are involved, you will be informed of the reasons for the study and you will give your consent to participate to the doctor treating you. You may withdraw your consent (withdraw from the study) at any time without any consequences for your treatment, which will continue as normal.

➤ **Special features regarding the protection of personal data**

The purpose of the research is to advance scientific and medical knowledge through the wealth of information gathered during treatment. The legal basis for this research is therefore the performance of a task carried out in the public interest or, depending on the case, the pursuit of a legitimate interest, or on the basis of consent.

The data retention period is determined according to the type of research and in compliance with applicable regulations.

The findings from research projects (results, scores, etc.) may be published in scientific publications.

You may, at any time and without justification, exercise your right to object to the use of your data for research purposes by contacting the CCM management or the data protection officer. Your objection will not affect the quality of your medical care or treatment, nor your relationship with the medical team.