

# **TUOTEMPO.COM**

## **PERSONAL DATA PROCESS AND DATA PRIVACY PROTECTION**

Tuotempo's commitment to protecting personal data and complying with privacy principles is total. The whole service is hosted on our servers, in a highly secure and reliable Data Center facility. Any user's access to Tuotempo requires a user name and a password. All communications between a user and Tuotempo are encrypted (SSL protocol, 128-bit keys) and therefore not accessible to others. When necessary, all data temporarily stored in our servers can be also encrypted. The following document presents the necessary procedures for a correct use of the service, while ensuring an absolute protection of the Privacy of your clients and patients.

# OPERATING PROCEDURE

## 1. WHICH INFORMATION DOES TUOTEMPO IMPORT FROM MY MANAGEMENT SOFTWARE?

tuOtempO reads from the data stored in your hospital or practice management software only the information strictly necessary to provide a useful communication service for clients, patients and doctors.

Information stored in your management software are accessed by means of tuOtempO SINCRO, a small software tool installed on the same computer hosting your management software's database. At user-predefined intervals, tuOtempO SINCRO reads the necessary data and transmit them to tuOtempo server, where they will be stored only for the time strictly necessary for the messages to be sent.

tuOtempO SINCRO lets you **choose** which information will be imported and which won't. The only two pieces of information essential to the service are:

1. Client's email address or telephone number
2. Appointment's date and time

Such data are typically stored in our server for no longer than 24 hours; that is: from the moment the reminder is sent to the time of the appointment. During this interval responses to the reminder message sent by the client (for example: to confirm or cancel the appointment) can be processed by tuOtempO and shown in your Management software

Naturally, you can also decide to configure tuOtempO SINCRO as to import more data and storing them longer. By doing so, you will have a wider range of options for personalizing service and communication. A detailed list of the information tuOtempO SINCRO can extract and related services is presented in Table 1.

## 2. DOES TUOTEMPO EXTRACT SENSIBLE DATA?

The required data involved in the process are merely personal

data and not sensible as in the definition of "sensible data" commonly accepted in privacy protection international regulations:

"sensible data": personal information about an individual, referring to ethnic or race origin, ideology, employment and economic status, religious beliefs, syndicate affiliation, health, sexual life, and political orientation.

Processed data could therefore be considered sensible only if associated to a particular medical service or treatment and, even in this case, only where the type of medical service or the name of the healthcare provider could be directly associated with a particular medical condition (please see table 1 at the end of this document for more details). When configuring tuOtempO SINCRO, if you choose not to import these kind information (type of medical service or treatment, name of the doctor etc.), no sensible data will be processed by tuOtempO.

### 3. HOW WILL THIS AFFECT MY CURRENT PROCEDURES FOR PROCESSING PERSONAL DATA?

Your clients or patients have already given you permission to process their personal data. If the only data shared with tuOtempO are:

1. Email address or telephone number
2. Appointment's date and time

you do not need to ask for an extension of this permission. A new and explicit consent to share personal data with tuOtempO is only required if:

- a) you need to process potentially sensible data
- AND
- b) the authorization to process personal data that your clients gave you, does not already include third-party data sharing.

In this case, you will simply need to ask your clients or patients a new authorization to share part of their data with tuOtempO. In many countries, in order to facilitate the development of new services for the public utility, local regulations allow a simplified procedure for healthcare

providers, as described below in paragraph 5.

#### 4. SHOULD I ASK AN EXPLICIT CONSENT IN ORDER TO SEND MESSAGES TO CLIENTS OR PATIENTS?

Yes, you must. In order to send email voice or text messages (SMS) to your clients or patients, you need their prior consent. In many countries, in order to facilitate the development of new services for the public utility, local laws or regulations allow a simplified procedure for healthcare providers, as described below in paragraph 5.

#### 5. HOW CAN I ASK MY CLIENTS OR PATIENTS'S CONSENT TO PROCESS PERSONAL DATA AND AUTHORIZATION TO SEND COMMUNICATIONS?

In several countries, for healthcare providers is made available a simplified procedure, **allowing them to obtain consent orally, either face to face or over the phone**, for example during a call for an appointment request.

You can obtain oral consent by simply asking authorization "to use a service for appointment-related communications via email, sms or voice message" by the end of the appointment request. Oral consent is acceptable and legally valid in many countries. It is however essential for its validity, to keep a written or electronic record of the oral consent (whether is obtained face to face or over the phone). Oral consent can be recorded electronically by registering it in a specific field of your patients record in your management software. tuOtempO SINCRO will then acquire this information and use it to determine which data patient's data can be accessed and which can't.

For instance, when taking an appointment for Joe Smith with Dr. Mayer on October 28th, we'll also record his consent in the system.

The oral consent is legally sufficient in most

countries. However, those needing a written consent can obtain it when the client show up for the appointment. The following text can be added to the existing consent form:

"The information you provided will be used to activate an Online Appointment Scheduling service and to deliver communications about your appointments or any related service provided by our Center. The communications will be sent by Email, SMS, FAX or Voice Message. For the purposes stated above, your data could be used by tuOtempO SRL, based in Via Ugo Bassi 11, 40121 Bologna, Italy.

## 6. HOW DOES TUOTEMPO HANDLE PRIVACY CONSENT FOR DATA SHARING COMMUNICATION DELIVERY?

Contact info about clients and patients cannot be utilized in tuOtempO unless the contact data comes along with Privacy consent. Privacy consent status is mandatory and is acquired by tuOtempO SINCRO from your Hospital Management Software. You can choose to do not share with tuOtempO contact data of patients who denied Privacy consent.

**TABLE 1.**  
**DATA TO BE ACQUIRED AND RELATED FEATURES**

Information	Description	Example	Optional or Essential ?	Data sensibility	Service limitations (if data is not acquired)
Client or patient's ID	Full name (or Code)	Joe Smith	Optional. Can be aquired in form of a code (e.g.: client 343454).	Low. Merely personal, not sensible data.	If only a code is acquired instead of the full name: -it will not be possible to include the client's name in messages (e.g.: "Dear Mr. Joe Smith, we are glad to remind your appointment...")  - it will not be possible to send messages to a single client or patient by selecting his name.  -Doctors (or other resources) will not be able to read the patient/client's name when browsing their online schedule or when receiving their next day's schedule by SMS text message.
Contact details	Landline, Mobile, Email or Fax	051232434; 334565765; joe@gmail.com	It is essential to provide at least one contact data.	Low. Merely personal, not sensible data.	Data is essential for providing the service.
Other client/patient info	Birth, gender, address, etc.	10.02.1964; M, London,	Essential	Low. Merely personal, not sensible data.	Without collecting this data, it will not be possible to select groups of patients according to certain criteria (e.g.: send a message to inform about a new service to all "women" "between 35 and 60 y.o.a.").
Appointment's date and time	Scheduled date and time of the appointment.	2/06/08 16:30	Essential	Low. Not sensible data.	
Client's privacy consent	Authorization to process data and send messages.	Yes or No	Essential	-	Data is essential for providing the service.
Name of hospital or pratice.	Name of the facility providing the service.	"Salus" Private Clinic	Essential	It depends. Potentially high if a medical condition can be inferred from this data.	Data is essential for providing the service.
Resource's name (Doctor, professional diagnostic instrument, etc.)	Name of the person (e.g.: a Doctor) providing the service	Dr E.Grey	Optional. Can be aquired in form of a code (e.g.: resource 23).	It depends. Potentially high if a medical condition can be inferred from this data.	It will not be possible to include the resource's name in messages (e.g.: "...your appointment with Dr Grey ...")
Service	Name of the service	CT scan	Optional	High. Sensible data.	Doctors will not be able to read the name of the service associated to each appointment in the online schedule or when receiving their next day's schedule by SMS text message.

