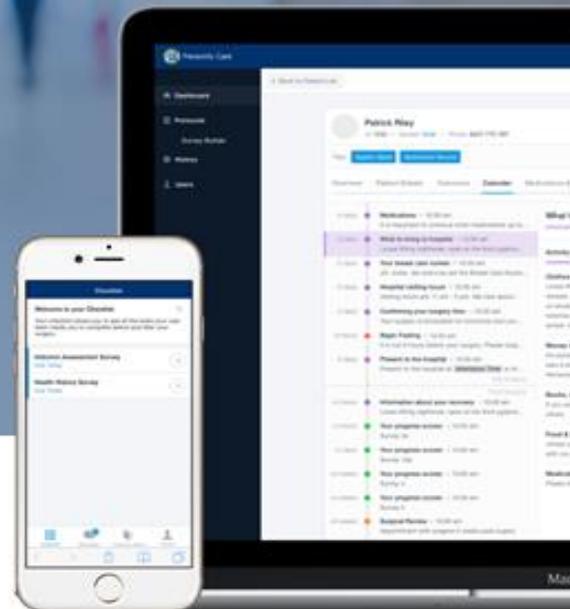


# Personify Care

Connecting Patients Beyond the Hospital Stay

## Privacy, Security and System Architecture



Privacy, Security, and System Architecture Overview (AU)

Last updated: 20 April 2020

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## 1. Background

Personify Care Pty Ltd (ABN 95 601 519 573) is an Australian registered company based in Adelaide, South Australia. Personify Care currently operates in Australia, New Zealand and the United States providing easy to use software to personalise the patient's experience before and after their hospital admission or clinical treatment.

Personify Care allows healthcare teams to deliver personalised digital patient pathways that can be easily tailored based on the patient's specific procedure, or hospital they are being admitted to. Information can be provided and collected from patients via a secure checklist containing things the patient needs to know, things a patient needs to do and assessments and forms they need to complete on any given day. Personify Care meets all requirements of the Australian Privacy Principles. Personify Care is being used by leading healthcare providers in ANZ to deliver thousands of daily patient interactions.

Selected healthcare team members get direct access to a Pathway Editor within the platform which provides a "drag-and-drop" interface to configure and update patient pathways at any time. This ensures that patient pathways can be configured to fit into their existing workflows within minutes (not months). At all times, healthcare teams maintain control of the protocols being delivered to their patients.

Personify Care is backed by private investors and is well positioned to continuously develop its mobile platform to serve the growing demand for a digitally connected pre-admission and post-discharge patient experience. Personify Care is also backed by the Australian federal government having won a competitive process to accelerate the commercialisation of its technology solution into the US market.

Customers are at the center of our Australian-based product engineering team. Our product roadmap is guided by customer feedback and industry best practice for delivering a new level of user experience to healthcare teams and patients. All our software engineering activity is conducted in Australia.

## 2. Privacy Compliance

As a digital health company, we operate in accordance with all applicable privacy and data protection laws. Doing so is fundamental to both our values as an organization and our ability to create product experiences that have a meaningful impact for our users. We take the trust that our users put in us very seriously and protect their privacy through our use of strict policies and best-in-class data protection technologies for handling personal information.

Personify Care acknowledges that Customer Data contains Personal Information and sensitive information (as that term is defined in the Privacy Act 1998 (Cth)) and that the law imposes strict obligations in relation to the collection, use and storage of such information. Personify Care ensures that all Customer Data is managed in accordance with Personify Care's privacy policy and that the Platform and all Customer Data will be managed in accordance with applicable Privacy Laws (including the Australian Privacy Principles). Personify Care also has clear policies in place for dealing with potential data breaches and complies with the notifiable data breach scheme set out in the Privacy Act 1988 (Cth).

A "privacy by design" approach has been used to develop the platform to meet the specific requirements of the healthcare sector. For example, as part of the patient registration process, a patient consent step is built-in to the user-flow, ensuring patients consent to using the platform to communicate with their healthcare provider prior to their account being created or any information about the patient being held in the platform.

Our full Privacy Policy in Australia can be accessed at any time via:

<https://www.personifycare.com/privacy-policy>

### 3. Data Security Compliance

The Personify Care platform is hosted on Amazon Web Services (AWS) infrastructure in Australia which is Information Security Registered Assessors Program (IRAP) certified by the Australian Signals Directorate (ASD) as listed here:

<https://www.cyber.gov.au/irap/cloud-services>

To protect personal and health information, Personify Care adopts a number of best-practice security measures including:

- Encryption of all data in transit using HTTPS (256-bit TLS) encryption, using RSA 2048 bits key
- Data encrypted at rest using AES 256-bit encryption
- Storage of all Australian user data in ISO 27001, ISO 27002, SOC 1/2/3, and PCI DSS Accredited Data Centres located within Australia:
  - ISO27001 certification available here:  
[https://d1.awsstatic.com/certifications/iso\\_27001\\_global\\_certification.pdf](https://d1.awsstatic.com/certifications/iso_27001_global_certification.pdf)
  - SOC3 report available here:  
[https://d1.awsstatic.com/whitepapers/compliance/AWS\\_SOC3.pdf](https://d1.awsstatic.com/whitepapers/compliance/AWS_SOC3.pdf)
- Data centre physical security is protected by biometric authentication, key-cards, and 24x7x365 surveillance
- Two-factor authentication to verify user identity and strong password enforcement
- Passwords are encrypted by a one-way hash function (bcrypt), using salt
- Monitoring and regular audits of user login activities

## 4. Vulnerability Prevention Processes

Personify Care has strict processes in place to protect against security vulnerabilities, including:

- Annual external penetration testing (External Penetration Testing Certificate available upon request)
- Regular scans are performed against the infrastructure
- Installed packages are monitored for known vulnerabilities
- Code review is completed before every major change to the code base as part of the release management process
- System is evaluated against the OWASP Top 10 vulnerabilities
- CSRF tokens are implemented to protect against CSRF attacks
- All input is filtered against XSS injections
- All SQL access is carried out via a data access abstraction layer, sanitizing variables passed in to prevent SQL injection

## 5. System Architecture

The Personify Care platform consists of two end-user components:

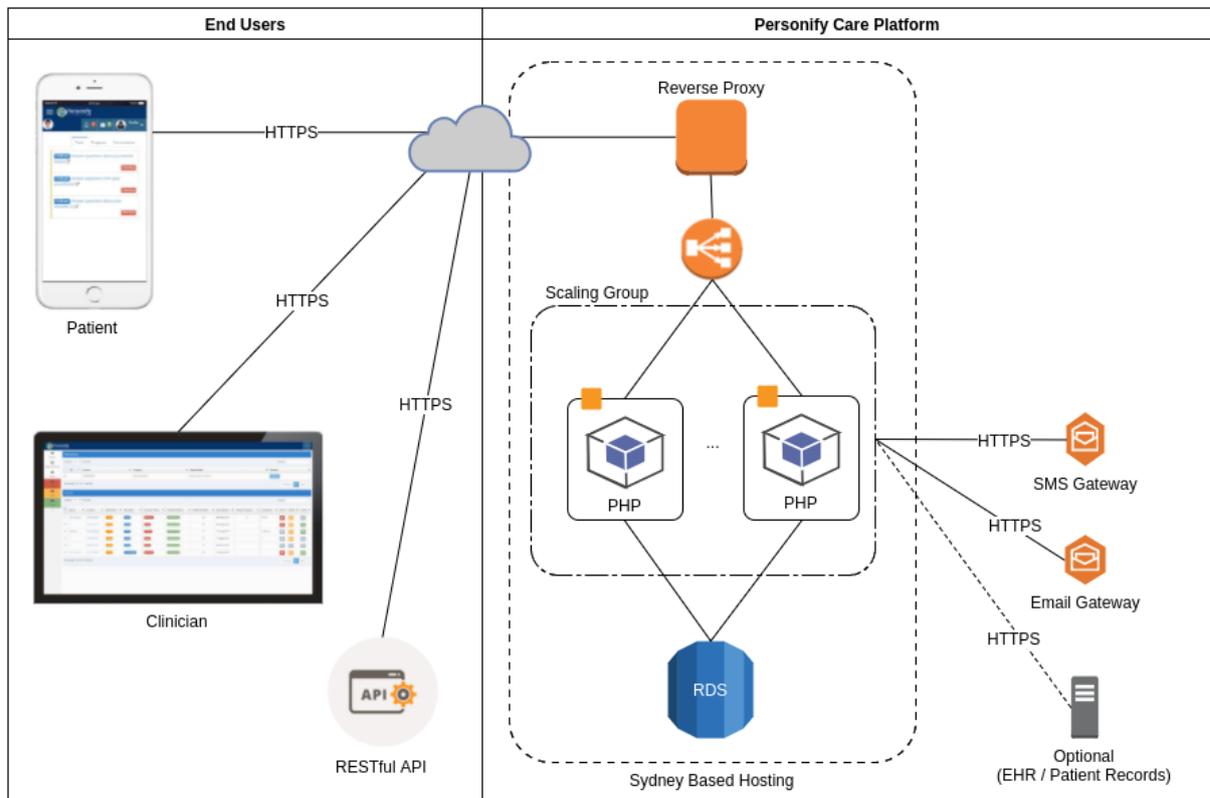
- **Staff dashboard**

Used by healthcare teams to configure patient pre-admission and post-discharge pathways, identify patients that require follow up and review patient progress.

- **Patient checklist**

Used by patients to access their checklist of activities as defined by the pathway assigned to them. This includes information they need to know, actions they need to take and assessments and forms they need to complete.

Underpinning Personify Care is a data analytics system that uses patient interaction data to model and continuously optimise the patient response rate. This ensures for example that the timing, frequency and medium of patient interactions can be tailored to reach a patient when it's most convenient for them and ensures healthcare teams have timely visibility to their progress. Below is a diagram depicting the system architecture:



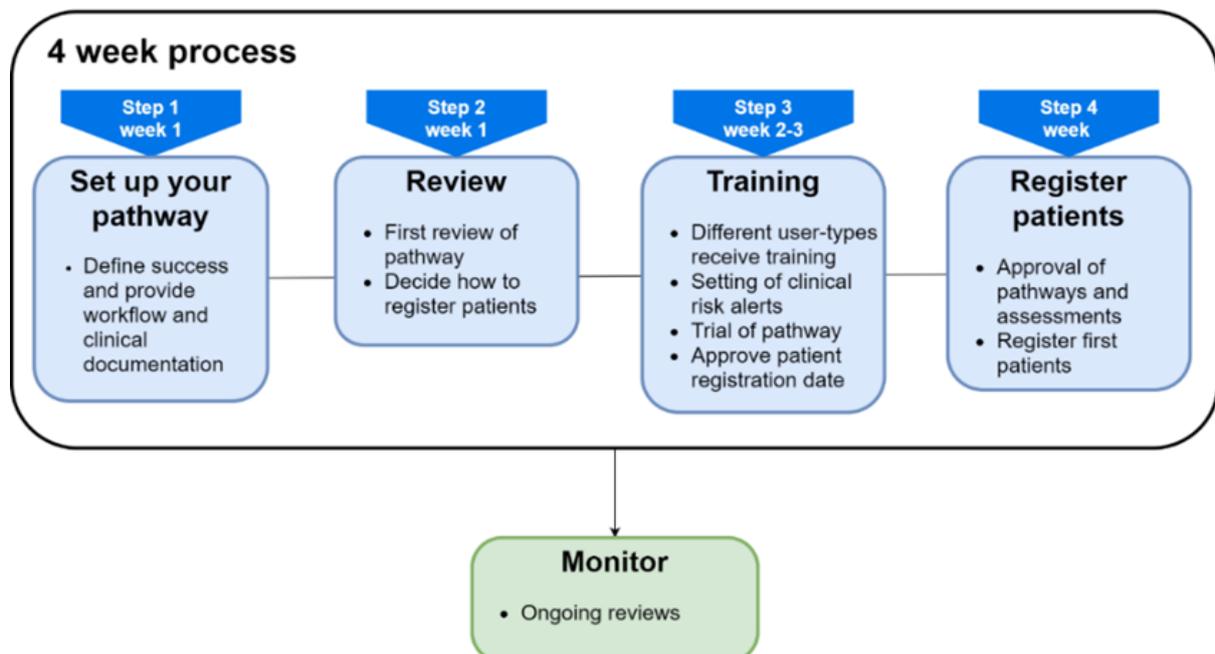
## 6. Implementation and Integration

Personify Care is being rolled-out by healthcare organisations across Australia and NZ with:

- No need to change clinical protocols or administrative workflows
- No lengthy upfront implementation / installation
- Healthcare staff using it after a 30-minutes induction
- No special hardware needed for the organisation or patient.

The typical onboarding process usually takes 2-4 weeks and involves the following steps:

1. **Setup the pathways:** this involves setting up the initial version of your patient pathway. We typically help you set up the initial version within 24-48 hours.
2. **Review the pathways:** this is typically a teleconference where we share access to a digital version of the pathway and review it with you.
3. **Train the team:** we provide your team with access and online induction to use their accounts and typically register staff as test patients to see the patient experience.
4. **Register patients:** once the final version of the pathway is approved, you're ready to start inviting your patients onto the platform.



Enterprise customers have access to the Personify Care API (Application Programming Interface) to enable information captured beyond the hospital stay to be used to augment the patient's existing medical record in an EMR or patient management system. If your organisation is using paper records, then the additional patient information can also be printed as a pdf document.

Personify Care's restful API provides full support for secure authentication, patient ID mapping, HL7 standards and has been successfully integrated into other patient systems to ensure patient records are stored centrally and no double entry of patient information is required.

## 7. Reliability

The Personify Care service is delivered through high availability infrastructure. All services are monitored 24/7 and the service is delivered through fully redundant network and hardware infrastructure with automated failover functionality. Daily encrypted data backup and restore procedures are in place and tested regularly.

## 8. Frequently Asked Questions

Q. Is data at rest encrypted?

- Yes, using AES 256-bit encryption

Q. Are there regular external vulnerability scans?

- Yes. ThreatStack / OpenVAS

Q. Where is data stored?

- Data for Australian and New Zealand users is held in Australia.

Q. Can we have audit reports?

- IRAP compliance:

<https://aws.amazon.com/compliance/irap/>

- SOC3 compliance:

[https://d1.awsstatic.com/whitepapers/compliance/AWS\\_SOC3.pdf](https://d1.awsstatic.com/whitepapers/compliance/AWS_SOC3.pdf)

- ISO 27001 certification:

[https://d1.awsstatic.com/certifications/iso\\_27001\\_global\\_certification.pdf](https://d1.awsstatic.com/certifications/iso_27001_global_certification.pdf)

Q. Is there a process for transferring/removing data upon request

- To facilitate transfer, all data is available through the system (or via the API) at any time. Additionally, reports can be provided to extract data that is needed on a regular basis. If a complete set of data is required, that can be facilitated as a once-off data transfer.
- Upon termination of an agreement, customer data can be completely removed from the system, including all patient information, patient pathways and group settings.

## 9. Help desk and support

Enterprise customers are provided with full online and telephone support during business hours. All new staff users are provided with full online induction and support within 48 hours of signing up for a new account.

Personify Care's Support Centre can be contacted via:



Live chat via [www.personifycare.com](http://www.personifycare.com)



Email [contact@personifycare.com](mailto:contact@personifycare.com)



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