



Policy Document

LAMISPlus Privacy Policy Document

JANUARY 2023



Privacy Policy

INTRODUCTION

Data for Implementation (Data.FI) is a global health field-support project implemented by Palladium. Data.FI helps countries strengthen routine health information systems to optimize efficiencies in the health sector, track and rapidly respond to the HIV epidemic and emerging health threats, and improve client care through integrated, and flexible digital health solutions, data analytics, and institutionalized data use practices.

Our services focus on the development and enhancement of digital health systems and their scale-up to transform health care, data analytic products that pinpoint health system inefficiencies and solutions, Decision-support interventions that enable programs maximize the use of data in real time, and the implementation of data standards and governance structures that optimize investments and ensure data quality.

At Data.FI, we understand the responsibility that comes along with providing digital health solutions and so have built in privacy protections with our users in mind. We have developed this Privacy Policy to help explain the privacy features of our Digital products and services we operate.

This Policy describes how we help users and implementing partners manage and protect the privacy of personal information through the use of our Solutions. The Policy also describes how we collect, use, disclose and protect personal information when you interact or use any of our products, applications (including the Solutions), or any other services made available through or in relation to the product and Solutions.

ACCOUNTABILITY

In adopting and adhering to this Policy, we want to ensure that the personal information collected using the application products will be used in an appropriate and responsible manner. Data.FI is committed to protecting the privacy of all personal information which will be provided using the our application products and we will ensure that personal information are managed in accordance with the Nigerian Data Protection Regulation and any other applicable data protection regulation framework.

This Policy applies to the personal information collected through the use of digital solutions and products by Data.Fi. This includes personal information collected, used, processed, and disclosed through:

- Data.FI digital Health solutions (LAMISPlus web, LAMISPlus Lite)
- Data.FI websites (HIS COP website)
- Correspondence from implementing partners about our products and solutions (including e-mails, messages sent to us through the helpdesk, and telephone calls)

WHAT IS PERSONAL IDENTIFIABLE INFORMATION (PII)

In this Policy, “personal identifiable information (PII)” means information about an identifiable individual, including personal health information that relates to an individual’s health, including diagnosis, treatment, and care information.

OUR SOLUTIONS

Data.FI solutions are designed to optimize efficiencies in the health sector, track and rapidly respond to the HIV epidemic and other emerging health threats, improve clients' care experience and ultimately, to improve health outcomes. Our solutions are tailored to the local context and are fit-for-purpose, reflecting an understanding of local epidemiology and healthcare context, local programming, country-specific health information system challenges and data needs, and the design preferences of different users. These include the following solutions:

- **LAMISPlus:** LAMISPlus Web is an optimized, integrated, and scaled Electronic Medical Records (EMR) solution that helps implementing partners and healthcare providers track clients across clinical services, improving continuity of care and the client care experience. The LAMISPlus EMR also generate high-quality data for clinical performance monitoring and case-based surveillance, informing client-centered approaches and enabling cohort analyses and program monitoring. The core application includes both a complete desktop version (**LAMISPlus Web**) and a companion mobile app (**LAMISPlus LITE**).

The personal information collected and used through these Solutions is typically managed by users , implementing mechanisms and healthcare professionals in the course of providing health care services to patients, or it may be provided directly by an individual while using the Solution.

WHAT PERSONAL INFORMATION ARE COLLECTED AND USED AND WHY?

Data.FI provides software solutions for implementing programs, healthcare providers and patients. While using our Solutions (LAMISPlus), healthcare providers will collect, use and/or disclose personal information about their patients, including personal health information. LAMISPlus EMR manages personal information on behalf of healthcare providers, who remain the custodian of that personal health information.

PERSONAL INFORMATION COLLECTED BY USERS THAT USE OUR LAMISPLUS

The LAMISPlus provide programs and healthcare providers with a platform to collect, use, process, store, and disclose patients' personal information. Below, we have described what types of personal information are collected by healthcare providers (including clinicians, pharmacists and data entry clerks (DECs)) using each solution.

LAMISPlus

The LAMISPlus EMR allows for the collection, use and disclosure of the following types of personal information by healthcare providers:

- Name
- Address
- Contact information, including phone number and e-mail address
- Demographic information, such as ethnicity, occupation, age, gender, and dependent information
- National Identification Number (NIN)

- Patient biometric information
- Personal health information, including:
 - Visits to your healthcare provider facility (e.g. date of visit, facility, visit type, services received, referring provider); and
 - Health information recorded by health care providers and their staff in the course of providing treatment (e.g. conditions, diagnoses, medications, diagnostic imaging, lab observations, immunizations, treatments, referrals, and clinical observations).

HOW DO WE SECURE YOUR PERSONAL INFORMATION?

The security of personal information when using our system is important to us.

We have built security features into the LAMISPlus to help users of the system and healthcare professionals protect patient personal health information when using the systems. Some of these features include access controls, unique user accounts, multi-factor authentication, app key encryption protocol, and active logging.

The LAMISPlus EMR takes precautions to help safeguard personal information using its user access management. Data.FI works with users and program implementers to ensure information security controls and protect patient health data against unauthorized access, collection, use, disclosure, and disposal of patient's personal information, in a manner appropriate to the sensitivity of the information. These measures include various administrative and technological safeguards including unique user accounts, and role-based access based on need to know. We also use security practices to protect our systems, which include but are not limited to regular monitoring of our systems for possible vulnerabilities and attacks, proactive penetration tests, encryption of data in transit to and at rest, active logging, and employing intrusion detection and prevention systems.

The safety and security of patient personal information also depends on the user. Data.FI is not responsible for any lost, stolen, or compromised usernames, passwords or for any activity on a user's account via unauthorized password activity. Users are required to take steps to protect against unauthorized access to their account by, choosing a robust password and keeping their username and password private. Data.FI is not responsible for any failure by users to secure their own devices and their access to the Internet or your use of public, unsecured networks while using the LAMISPlus.

QUESTIONS AND CONCERNS

Questions or concerns about personal health information should be directed to the healthcare provider and/or implementing program partner from whom a patient received healthcare services.

Questions or concerns regarding this Policy, including the collection of personal information, can be directed to the Data.FI Information Security Team, who is responsible for ensuring Data.FI's compliance with this Policy. You can contact the Information Security Team using the link below:

<https://hiscop.org>

CHANGES TO THE POLICY

Data.FI may update this Policy from time to time by posting a new version of the Policy on the Sites and the LAMISPlus EMR. If there are significant changes made to the Policy, we may notify users of the changes in advance by e-mail. We suggest that you review this Policy periodically.

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FOR MORE INFORMATION

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