

## MEDEANALYTICS' LEGITIMATE INTERESTS ASSESSMENT (LIA)

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**MedeAnalytics International Limited** (subsidiaries and affiliated companies herein referred to collectively as “MedeAnalytics”, “Company”, “We”, “Us”, “Our”), is a UK-based health and social care analytics provider that takes the responsibility of collecting and processing Hospital Episode Statistics (HES) data seriously, and is committed to properly addressing applicable data protection requirements in a way that is transparent, responsive, and reliable.

MedeAnalytics has access to HES data, provided under agreement with NHS Digital, in accordance with end-user contracts (UK “Customers”) and is both a processor and controller under laws relating to the processing of personal data, privacy and security, including, without limitation and to the extent applicable from time-to-time (i) national laws implementing the EU Data Protection Directive (95/46/EC) and the EU Privacy and Electronic Communications Directive (2002/58/EC) (ii) the General Data Protection Regulation (EU) 2016/679 (GDPR), and (iii) all other applicable international, regional, and/or national data protection laws and regulations (“Data Protection Laws”).

This Legitimate Interest Assessment (LIA) is a critical step in Our compliance with Data Protection Laws. In order to process HES data fairly and lawfully, MedeAnalytics must have lawful bases for processing activities. MedeAnalytics’ legal bases for processing HES data are covered under Article 6(1)(f) and Article 9(2)(j) of the GDPR.

Our legitimate interests are a necessary and lawful bases for processing and controlling HES data, as they enable Us to assist Customers with the access and use of Our medical analytics products and services, and the development of the same. MedeAnalytics considers access to its analytics to be in the public interest as well as of critical value to end-user Customers, so they can better understand their patient pools and make better health and social care decisions. Our legitimate interests also include for MedeAnalytics to continue as a leading provider of mission critical medical analytics in the UK, and as well to support compliance with the NHS’ clinical and non-clinical performance expectations, using Our solutions to identify clinical domains where there are significant outliers, enabling Customers to prioritise service redesign activities.

MedeAnalytics solutions can also be utilized by Customers to produce baselines for innumerable outcome metrics derived from key data combinations, to support better use of resources, staff, and services, ultimately resulting in better health and social care outcomes. It is important to note that access to HES data by MedeAnalytics’ Customers is only ever to aggregated data, with numbers suppressed in line with ICO standards, and pseudonymisation always occurring prior to transfer of HES data to MedeAnalytics.

We firmly believe that Our processing activities are a necessary, targeted, and proportionate means of achieving the purposes of the legitimate interests outlined above, and these interests are not overridden by moral or ethical issues, and balance against any impact on individual rights. MedeAnalytics uses the least intrusive means possible to achieve the analytics it provides to Customers, strictly within the UK only. The risks of any data breach are clearly understood by MedeAnalytics, which is why We require HES data to be pseudonymised before it is provided to Us, and we do not require access to the encryption key in order to process HES information.

The solutions that MedeAnalytics delivers are limited to clinical commissioning groups, care quality commission registered providers, public health departments, and similar health care providers within the UK. Our objective for processing is to provide commissioning activities, operational and financial analytics, comparators and indicators, data quality validation, and other critical insights as requested and directed by Customers on the basis of the pseudonymised HES data.

We aspire always to bring fulfillment of a positive outcome for all involved with Our products and services, and the public ultimately, as outlined herein. MedeAnalytics regularly reviews its legitimate interests, this LIA, and the underlying operationalization of controlling and processing HES data, to bring Data Protection Laws compliance and best practice to the forefront of Our aim and offering.