Manufacturer Disclosure Statement for Medical Device Security -- MDS2

Edan Instruments, In SL12A 091-0397-00 Rev A 4-Aug-2022

Overetien ID	Overtion		Can mate
Question ID	Question		See note
DOC-1	Manufacturer Name	Edan Instruments, Inc.	_
DOC-2	Device Description	Electrocardiograph	
DOC-3	Device Model	SL12A	
DOC-4	Document ID	091-0397-00 Rev A	
DOC-5	Manufacturer Contact Information	berlin.wang@edan.com	
		SL12A can communicate ECG	
		measurement data between	
		device and EDAN's SE-1515 PC	
	Intended use of device in network-connected	ECG or data management	
DOC-6	environment:	software.	
DOC-7	Document Release Date	8/4/2022	
200.	Coordinated Vulnerability Disclosure: Does the		
	manufacturer have a vulnerability disclosure		
DOC-8	program for this device?	No	
2000	ISAO: Is the manufacturer part of an Information	110	_
DOC-9	Sharing and Analysis Organization?	No	
DOO-9		FDAN Vorkstation/Brok	_
	available that indicates connections to other	Qr 1	
		25	
DOC-10	system components or expected external resources?	SLEA	
	SaMD: Is the device Software as a Medical		_
DOC-11	Device (i.e. software-only, no hardware)?	No	
DOC-11.1	Does the SaMD contain an operating system?	N/A	
200	Does the SaMD rely on an owner/operator		
	provided operating system?		
DOC-11.2		N/A	_
	Is the SaMD hosted by the manufacturer?		
DOC-11.3		N/A	
DOC-11.4	Is the SaMD hosted by the customer?	N/A	
200	ie ine came nected by the eacterner.		
		Yes, No,	
		N/A, or	
		See Note	Note #
	MANAGEMENT OF PERSONALLY	20011010	11010 11
	IDENTIFIABLE INFORMATION		
	Can this device display, transmit, store, or modify		
MDII 1	personally identifiable information (e.g. electronic	Yes	
MPII-1	Protected Health Information (ePHI))?	res	
MDU O	Does the device maintain personally identifiable	Vaa	
MPII-2	information?	Yes	
	Does the device maintain personally identifiable		
	information temporarily in volatile memory (i.e.,		
MPII-2.1	until cleared by power-off or reset)?	No	_
	Does the device store personally identifiable		
MPII-2.2	information persistently on internal media?	Yes	_
	Is personally identifiable information preserved in		
	the device's non-volatile memory until explicitly		
MPII-2.3	erased?	Yes	
	Does the device store personally identifiable		
MPII-2.4	information in a database?	No	
	Does the device allow configuration to		
	automatically delete local personally identifiable		
	information after it is stored to a long term		
MPII-2.5	solution?	No	
	Does the device import/export personally		
	identifiable information with other systems (e.g., a		
	wearable monitoring device might export		
MPII-2.6	personally identifiable information to a server)?	Yes	
	Does the device maintain personally identifiable		
	. ,		
	inionnation when powered on, or duffin power		
MPII-2.7	information when powered off, or during power service interruptions?	No	
MPII-2.7	service interruptions?	No	_
MPII-2.7	service interruptions? Does the device allow the internal media to be	No	_
MPII-2.7 MPII-2.8	service interruptions?	No No	_

	Does the device allow personally identifiable			
	information records be stored in a separate			
	location from the device's operating system (i.e.			
	secondary internal drive, alternate drive partition,			
MPII-2.9	or remote storage location)?	No		
	Does the device have mechanisms used for the			
	transmitting, importing/exporting of personally			
MPII-3	identifiable information?	Yes		
	Does the device display personally identifiable			
MPII-3.1	information (e.g., video display, etc.)?	Yes		
	Does the device generate hardcopy reports or			
	images containing personally identifiable			
MPII-3.2	information?	Yes		
	Does the device retrieve personally identifiable			
	information from or record personally identifiable			
	information to removable media (e.g., removable-			
	HDD, USB memory, DVD-R/RW,CD-R/RW, tape,			
MPII-3.3	CF/SD card, memory stick, etc.)?	Yes		
	Does the device transmit/receive or import/export			
	personally identifiable information via dedicated			
	cable connection (e.g., RS-232, RS-423, USB,			
MPII-3.4	FireWire, etc.)?	Yes		
	Does the device transmit/receive personally			
	identifiable information via a wired network			
MPII-3.5	connection (e.g., RJ45, fiber optic, etc.)?	Yes		
	Does the device transmit/receive personally			
	identifiable information via a wireless network			
	connection (e.g., WiFi, Bluetooth, NFC, infrared,			
MPII-3.6	cellular, etc.)?	Yes		
	Does the device transmit/receive personally			
	identifiable information over an external network	N.		
MPII-3.7	(e.g., Internet)?	No		
	Does the device import personally identifiable			
MPII-3.8	information via scanning a document?	No		
MBUOO	Does the device transmit/receive personally	v.		
MPII-3.9	identifiable information via a proprietary protocol?	Yes		
	Does the device use any other mechanism to			
MBUOAG	transmit, import or export personally identifiable	N-		
MPII-3.10	information?	No		
Management of Private Data notes:				

AUTOMATIC LOGOFF (ALOF)

The device's ability to prevent access and misuse by unauthorized users if device is left idle for a period of time.

Can the device be configured to force reauthorization of logged-in user(s) after a predetermined length of inactivity (e.g., autologoff, session lock, password protected screen saver)?

Is the length of inactivity time before autologoff/screen lock user or administrator configurable?

No ____ N/A ___

AUDIT CONTROLS (AUDT)

ALOF-1

ALOF-2

AUDT-1 AUDT-1.1

AUDT-1.2

AUDT-2

AUDT-2.1

AUDT-2.2

AUDT-2.3

The ability to reliably audit activity on the device.

Can the medical device create additional audit logs or reports beyond standard operating system logs?

Does the audit log record a USER ID?

Does other personally identifiable information exist in the audit trail?

Are events recorded in an audit log? If yes, indicate which of the following events are recorded in the audit log:

Successful login/logout attempts?

Unsuccessful login/logout attempts? Modification of user privileges?

n		
	No	_
	N/A	_
	N/A	
	No	_
	N/A	_
	N/A	_
	N/A	_

AUDT-2.4	Creation/modification/deletion of users?	N/A
NOD1 Z.4	Presentation of clinical or PII data (e.g. display,	
AUDT-2.5	print)?	N/A
AUDT-2.6	Creation/modification/deletion of data?	N/A
7.001 2.0	Import/export of data from removable media (e.g.	_
AUDT-2.7	USB drive, external hard drive, DVD)?	N/A
7.02.1 2	Receipt/transmission of data or commands over a	
AUDT-2.8	network or point-to-point connection?	N/A
AUDT-2.8.1	Remote or on-site support?	N/A
	Application Programming Interface (API) and	-
AUDT-2.8.2	similar activity?	N/A
AUDT-2.9	Emergency access?	N/A
AUDT-2.10	Other events (e.g., software updates)?	N/A
AUDT-2.11	Is the audit capability documented in more detail?	N/A
	Can the owner/operator define or select which	
AUDT-3	events are recorded in the audit log?	No
	Is a list of data attributes that are captured in the	
AUDT-4	audit log for an event available?	No
AUDT-4.1	Does the audit log record date/time?	N/A
	Can date and time be synchronized by Network	
AUDT-4.1.1	Time Protocol (NTP) or equivalent time source?	N/A
AUDT-5	Can audit log content be exported?	No
AUDT-5.1	Via physical media?	N/A
	Via IHE Audit Trail and Node Authentication	
AUDT-5.2	(ATNA) profile to SIEM?	N/A
	Via Other communications (e.g., external service	
AUDT-5.3	device, mobile applications)?	N/A
	Are audit logs encrypted in transit or on storage	
AUDT-5.4	media?	N/A
ALIDT C	Can audit logs be monitored/reviewed by	Nia.
AUDT-6	owner/operator?	No
AUDT-7	Are audit logs protected from modification?	No
AUDT-7.1	Are audit logs protected from access?	No No
AUDT-8	Can audit logs be analyzed by the device?	No

AUTHORIZATION (AUTH)

The ability of the device to determine the authorization of users.

	Does the device prevent access to unauthorized		
	users through user login requirements or other		
AUTH-1	mechanism?	No	_
	Can the device be configured to use federated		
	credentials management of users for		
AUTH-1.1	authorization (e.g., LDAP, OAuth)?	N/A	_
	Can the customer push group policies to the		
AUTH-1.2	device (e.g., Active Directory)?	N/A	_
	Are any special groups, organizational units, or		
AUTH-1.3	group policies required?	N/A	_
	Can users be assigned different privilege levels		
	based on 'role' (e.g., user, administrator, and/or		
AUTH-2	service, etc.)?	No	_
	Can the device owner/operator grant themselves		
	unrestricted administrative privileges (e.g.,		
	access operating system or application via local		
AUTH-3	root or administrator account)?	No	
	Does the device authorize or control all API		
AUTH-4	access requests?	No	—
	Does the device run in a restricted access mode,		
AUTH-5	or 'kiosk mode', by default?	No	_

CYBER SECURITY PRODUCT UPGRADES (CSUP)

The ability of on-site service staff, remote service staff, or authorized customer staff to install/upgrade device's security patches.

	Does the device contain any software or firmware	1
	which may require security updates during its	
	operational life, either from the device	
	manufacturer or from a third-party manufacturer	
	of the software/firmware? If no, answer "N/A" to	
CSUP-1	questions in this section.	Yes
00115 5	Does the device contain an Operating System? If	
CSUP-2	yes, complete 2.1-2.4.	Yes
	Does the device documentation provide	
00110 6 4	instructions for owner/operator installation of	
CSUP-2.1	patches or software updates?	Y
	Does the device require vendor or vendor-	
00115 0 0	authorized service to install patches or software	
CSUP-2.2	updates?)
	Does the device have the capability to receive	
	remote installation of patches or software	
CSUP-2.3	updates?	
	Does the medical device manufacturer allow	
	security updates from any third-party	
	manufacturers (e.g., Microsoft) to be installed	
CSUP-2.4	without approval from the manufacturer?	1
	Does the device contain Drivers and Firmware? If	f
CSUP-3	yes, complete 3.1-3.4.	Y
	Does the device documentation provide	
	instructions for owner/operator installation of	
CSUP-3.1	patches or software updates?	Υ
	Does the device require vendor or vendor-	ľ
	authorized service to install patches or software	
CSUP-3.2	updates?	Υ
JJU1 -J.Z	Does the device have the capability to receive	-['
	remote installation of patches or software	
CCLID-3 3	-	
CSUP-3.3	updates?	١
	Does the medical device manufacturer allow	
	security updates from any third-party	
	manufacturers (e.g., Microsoft) to be installed	
CSUP-3.4	without approval from the manufacturer?	ŀ
	Does the device contain Anti-Malware Software?	
CSUP-4	If yes, complete 4.1-4.4.	
	Does the device documentation provide	
	instructions for owner/operator installation of	
CSUP-4.1	patches or software updates?	
	Does the device require vendor or vendor-	
	authorized service to install patches or software	
CSUP-4.2	updates?	ı
	Does the device have the capability to receive	
	remote installation of patches or software	
CSUP-4.3	updates?	Ν
_	Does the medical device manufacturer allow	
	security updates from any third-party	
	manufacturers (e.g., Microsoft) to be installed	
CSUP-4.4	without approval from the manufacturer?	N
5501 - 1.4	Does the device contain Non-Operating System	1
	1 5 7	
COLID F	commercial off-the-shelf components? If yes,	N
CSUP-5	complete 5.1-5.4.	N
	Does the device documentation provide	
00115 5 4	instructions for owner/operator installation of	
CSUP-5.1	patches or software updates?	Ν
	Does the device require vendor or vendor-	
	authorized service to install patches or software	
CSUP-5.2	updates?	1
	Does the device have the capability to receive	
	remote installation of patches or software	
CSUP-5.3	updates?	١
	Does the medical device manufacturer allow	T
	security updates from any third-party	
	manufacturers (e.g., Microsoft) to be installed	
CSUP-5.4	without approval from the manufacturer?	N
JUUGI -U.+		N/A

	Does the device contain other software	
	components (e.g., asset management software,	
	license management)? If yes, please provide	
CSUP-6	details or refernce in notes and complete 6.1-6.4.	No
	Does the device documentation provide	
	instructions for owner/operator installation of	
CSUP-6.1	patches or software updates?	N/A
	Does the device require vendor or vendor-	
	authorized service to install patches or software	
CSUP-6.2	updates?	N/A
	Does the device have the capability to receive	
	remote installation of patches or software	
CSUP-6.3	updates?	N/A
	Does the medical device manufacturer allow	
	security updates from any third-party	
	manufacturers (e.g., Microsoft) to be installed	
CSUP-6.4	without approval from the manufacturer?	N/A
	Does the manufacturer notify the customer when	
CSUP-7	updates are approved for installation?	Yes
	Does the device perform automatic installation of	
CSUP-8	software updates?	No
	Does the manufacturer have an approved list of	
	third-party software that can be installed on the	
CSUP-9	device?	No
	Can the owner/operator install manufacturer-	
	approved third-party software on the device	
CSUP-10	themselves?	No
	Does the system have mechanism in place to	
CSUP-10.1	prevent installation of unapproved software?	N/A
	Does the manufacturer have a process in place to)
CSUP-11	assess device vulnerabilities and updates?	Yes
	Does the manufacturer provide customers with	
CSUP-11.1	review and approval status of updates?	No
CSUP-11.2	Is there an update review cycle for the device?	No

HEALTH DATA DE-IDENTIFICATION (DIDT)

DATA BACKUP AND DISASTER RECOVERY (DTBK)

DIDT-1

DIDT-1.1

The ability to recover after damage or destruction of device data, hardware, software, or site configuration information.

	Does the device maintain long term primary	
	storage of personally identifiable information /	
DTBK-1	patient information (e.g. PACS)?	No
	Does the device have a "factory reset" function to	
	restore the original device settings as provided by	
DTBK-2	the manufacturer?	Yes
	Does the device have an integral data backup	
DTBK-3	capability to removable media?	Yes
	Does the device have an integral data backup	
DTBK-4	capability to remote storage?	Yes
	Does the device have a backup capability for	
	system configuration information, patch	
DTBK-5	restoration, and software restoration?	No
	Does the device provide the capability to check	
DTBK-6	the integrity and authenticity of a backup?	No

EMERGENCY ACCESS (EMRG)

The ability of the device user to access personally identifiable information in case of a medical emergency situation that requires immediate access to stored personally identifiable information.

Does the device incorporate an emergency EMRG-1 access (i.e. "break-glass") feature?

No ___

HEALTH DATA INTEGRITY AND AUTHENTICITY (IGAU)

How the device ensures that the stored data on the device has not been altered or destroyed in a non-authorized manner and is from the originator. Does the device provide data integrity checking mechanisms of stored health data (e.g., hash or digital signature)?

Does the device provide error/failure protection and recovery mechanisms for stored health data

and recovery mechanisms for stored health data (e.g., RAID-5)?

IGAU-1

MLDP-5

MLDP-5.1

MLDP-5.2

No	_
No	

MALWARE DETECTION/PROTECTION (MLDP)

The ability of the device to effectively prevent, detect and remove malicious software (malware). Is the device capable of hosting executable

MLDP-1 No Does the device support the use of anti-malware software (or other anti-malware mechanism)? MLDP-2 Provide details or reference in notes. Yes Does the device include anti-malware software by MLDP-2.1 default? N/A Does the device have anti-malware software MLDP-2.2 available as an option? N/A Does the device documentation allow the owner/operator to install or update anti-malware MLDP-2.3 N/A software? Can the device owner/operator independently (re-MLDP-2.4 N/A)configure anti-malware settings? Does notification of malware detection occur in MLDP-2.5 the device user interface? N/A Can only manufacturer-authorized persons repair N/A MLDP-2.6 systems when malware has been detected? MLDP-2.7 Are malware notifications written to a log? N/A Are there any restrictions on anti-malware (e.g., MLDP-2.8 purchase, installation, configuration, scheduling)? N/A If the answer to MLDP-2 is NO, and anti-malware cannot be installed on the device, are other MLDP-3 compensating controls in place or available? N/A Does the device employ application whitelisting that restricts the software and services that are MLDP-4 N/A permitted to be run on the device? Does the device employ a host-based intrusion

No

No

NODE AUTHENTICATION (NAUT)

system be configured by the customer?
Can a host-based intrusion detection/prevention

system be installed by the customer?

Can the host-based intrusion detection/prevention

detection/prevention system?

The ability of the device to authenticate communication partners/nodes.

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Is the device configurable to lock out a user after a certain number of unsuccessful logon attempts? No PAUT-3 Are all default accounts (e.g., technician service accounts, administrator accounts) listed in the PAUT-4 documentation? N/A PAUT-5 Can all passwords be changed? Yes Is the device configurable to enforce creation of user account passwords that meet established PAUT-6 (organization specific) complexity rules? No Does the device support account passwords that PAUT-7 expire periodically? No Does the device support multi-factor PAUT-8 authentication? No PAUT-9 Does the device support single sign-on (SSO)? No Can user accounts be disabled/locked on the PAUT-10 device? N/A PAUT-11 Does the device support biometric controls? No Does the device support physical tokens (e.g. PAUT-12 badge access)? No Does the device support group authentication PAUT-13 (e.g. hospital teams)? No Does the application or device store or manage PAUT-14 authentication credentials? No PAUT-14.1 Are credentials stored using a secure method? N/A PHYSICAL LOCKS (PLOK) Physical locks can prevent unauthorized users with physical access to the device from compromising the integrity and confidentiality of personally identifiable information stored on the device or on removable media Is the device software only? If yes, answer "N/A" PLOK-1 to remaining questions in this section. No Are all device components maintaining personally identifiable information (other than removable media) physically secure (i.e., cannot remove PLOK-2 without tools)? Yes Are all device components maintaining personally identifiable information (other than removable media) physically secured behind an individually PLOK-3 keyed locking device? No Does the device have an option for the customer to attach a physical lock to restrict access to PLOK-4 removable media? No **ROADMAP FOR THIRD PARTY** COMPONENTS IN DEVICE LIFE CYCLE (RDMP) Manufacturer's plans for security support of thirdparty components within the device's life cycle. Was a secure software development process. such as ISO/IEC 27034 or IEC 62304, followed RDMP-1 during product development? Yes Does the manufacturer evaluate third-party applications and software components included in RDMP-2 the device for secure development practices? Yes Does the manufacturer maintain a web page or other source of information on software support RDMP-3 dates and updates? No Does the manufacturer have a plan for managing RDMP-4 third-party component end-of-life? Yes

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N/A

SAHD-10

intended use of the device deleted/disabled?

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	Can the device prohibit boot from uncontrolled or	
	removable media (i.e., a source other than an	
SAHD-11	internal drive or memory component)?	Yes
	Can unauthorized software or hardware be	
	installed on the device without the use of physica	
SAHD-12	tools?	No
	Does the product documentation include	
04110.40	information on operational network security	N
SAHD-13	scanning by users?	No
CALID 44	Can the device be hardened beyond the default provided state?	Mo
SAHD-14	Are instructions available from vendor for	No
SAHD-14.1	increased hardening?	No
0A11D-14.1	Can the system prevent access to BIOS or other	NO
SHAD-15	bootloaders during boot?	Yes
0	Have additional hardening methods not included	
SAHD-16	in 2.3.19 been used to harden the device?	No
		_
	SECURITY GUIDANCE (SGUD)	
	Availability of security guidance for operator and	
	administrator of the device and manufacturer	
	sales and service.	
	Does the device include security documentation	
SGUD-1	for the owner/operator?	No
	Does the device have the capability, and provide	
	instructions, for the permanent deletion of data	
SGUD-2	from the device or media?	Yes
SGUD-3	Are all access accounts documented?	N/A
	Can the owner/operator manage password	
SGUD-3.1	control for all accounts?	N/A
	Does the product include documentation on	
SCUD 4	recommended compensating controls for the	Mo
SGUD-4	device?	No
	HEALTH DATA STORAGE	
	CONFIDENTIALITY (STCF)	
	The ability of the device to ensure unauthorized	
	access does not compromise the integrity and	
	confidentiality of personally identifiable	
	information stored on the device or removable	
	media.	
STCF-1	Can the device encrypt data at rest?	No
STCF-1.1	Is all data encrypted or otherwise protected?	N/A
	Is the data encryption capability configured by	
STCF-1.2	default?	N/A
	Are instructions available to the customer to	
STCF-1.3	configure encryption?	N/A
	Can the encryption keys be changed or	
STCF-2	configured?	N/A
STOP 2	Is the data stored in a database located on the	No
STCF-3	device?	No
STCF-4	Is the data stored in a database external to the device?	No
5101-4	uevice:	
	TRANSMISSION CONFIDENTIALITY	
	(TXCF)	
	The ability of the device to ensure the	
	confidentiality of transmitted personally	
	connactification transmitted personally	
	identifiable information	
	identifiable information.	
	Can personally identifiable information be	
TXCE-1	Can personally identifiable information be transmitted only via a point-to-point dedicated	No
TXCF-1	Can personally identifiable information be transmitted only via a point-to-point dedicated cable?	No
TXCF-1	Can personally identifiable information be transmitted only via a point-to-point dedicated cable? Is personally identifiable information encrypted	No
TXCF-1	Can personally identifiable information be transmitted only via a point-to-point dedicated cable?	No

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TXCF-2.1	If data is not encrypted by default, can the customer configure encryption options? Is personally identifiable information transmission restricted to a fixed list of network destinations?	No Yes	_ _
TXCF-4	Are connections limited to authenticated systems? Are secure transmission methods supported/implemented (DICOM, HL7, IEEE	No	_
TXCF-5	11073)?	No	_
	TRANSMISSION INTEGRITY (TXIG)		
	The ability of the device to ensure the integrity of transmitted data.		
TXIG-1	Does the device support any mechanism (e.g., digital signatures) intended to ensure data is not modified during transmission?	No	
TXIG-2	Does the device include multiple sub-components connected by external cables?		_
	REMOTE SERVICE (RMOT)		
	Remote service refers to all kinds of device maintenance activities performed by a service person via network or other remote connection.		
RMOT-1	Does the device permit remote service connections for device analysis or repair?	No	_
RMOT-1.1	Does the device allow the owner/operator to initiative remote service sessions for device analysis or repair?	N/A	
RMOT-1.2	Is there an indicator for an enabled and active remote session?	N/A	_
RMOT-1.3	Can patient data be accessed or viewed from the device during the remote session?	N/A	_
RMOT-2	Does the device permit or use remote service connections for predictive maintenance data?	No	_
RMOT-3	Does the device have any other remotely accessible functionality (e.g. software updates, remote training)?	No	
RMOT-3	remote training)?	No	_

OTHER SECURITY CONSIDERATIONS (OTHR)

NONE

Notes:

Example note. Please keep individual notes to one cell. Please use separate notes for separate information

Note 1