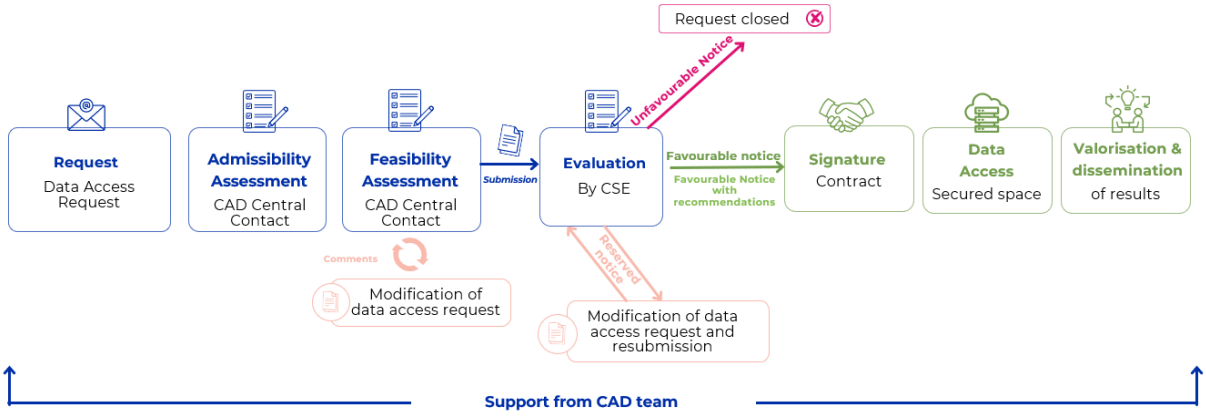
PROCEDURE FOR ACCESSING CAD DATA

Access to individual data stored in the CAD data warehouse, particularly data collected as part of the France Genomic Medicine Initiative 2025 (PFMG2025), follows a multi-step process. To facilitate this access and help project leaders obtain all the necessary opinions and authorizations, CAD offers support to project leaders.

A Scientific and Ethics Committee (CSE) is responsible for approving research projects that may reuse data collected under the PFMG2025 and hosted by the CAD. This approval is based on principles and criteria defined by a dedicated working group, and in accordance with the requirements of the French Data Protection Authority (CNIL – Commission Nationale de l'Informatique et des Libertés) for the reuse of sensitive data."

The procedures described in this document concern individual-level data produced as part of the PFMG2025.

Additionally, the CAD will make available aggregated datasets, consisting of statistical analysis results from genomic data of groups of individuals, which no longer pose a re-identification risk. Access to these aggregated datasets will not be subject will be subject to a simplified procedure.



1. Data Access Request

The research team completes the data access request form available on the PGMG2025 and CAD website.

A standard form is available online. Project leaders submit the completed data access request form electronically to the CAD Central Contact at etude@genomecad.fr, in PDF format.

Requests must be sent at least six weeks before the desired evaluation meeting.

2. Admissibility assessment

The CAD Central Contact checks whether the submitted data access request is complete and falls within CAD's scope.

An acknowledgment of admissibility or non-admissibility is sent to the project leader within seven (7) days for simple projects and fourteen (14) days for complex ones.

3. Feasibility assessment

Within seven (7) days, the CAD Central Contact forwards the data access request to the Operational Team for a feasibility analysis.

Feasibility assessment once completed is sent by CAD Central Contact to the project leader. Recommendations from the Operational Team may lead to modifications on the data access request previously submitted

4. Referral to the CSE

At the request of the project leader, the application file is sent by the Single Point of Contact to the Scientific and Ethics Committee (CSE) no later than fifteen (15) days before the Committee's evaluation.

The submitted files are shared with all CSE members, and two rapporteurs are appointed for each file by the Committee Chair. If necessary, an external rapporteur may be consulted.

The CSE meets at least six (6) times a year. The schedule is published on the CAD website or via other available communication channels.

5. Evaluation Procedure by the CSE

Each project on the agenda is discussed during a plenary session. The decisions of the Ethics and Scientific Committee (CSE) are made collectively, with members seeking to reach a consensus. In the event of a deadlock, the decision is put to a vote among the members present.

Projects are assessed based on three main criteria:

1. Objectives, methodology, and study data;
2. Feasibility of the study;
3. Public interest and reasonableness of the study.

An email from the CAD Central Contact is sent to project leaders within two weeks following the meeting to inform them of the decision. The CSE's Notice are substantiated and communicated to project leaders within two weeks after the CSE meeting

6. CSE notice

The CSE's role is to systematically issue a prior, reasoned opinion on project proposals requiring the reuse of EDS data. Possible outcomes include:

- Favourable: Access request approved as submitted. The CAD team contacts the project leader to arrange next steps.
- Favourable with recommendations: Access request approved, with minor non-blocking suggestions for improvement. The CAD team contacts the project leader to proceed with necessary adjustments and next steps.
- Reserved: Access is suspended due to major adjustments needed on the project as submitted. The Single Point of Contact supports the project leader in revising and resubmitting the data access request to the CSE.
- Unfavourable: Access is denied. A whole new data access request submission is required for evaluation by the CSE.

Notwithstanding the favourable notice of the CSE, the governance of the CAD may oppose the implementation of a project if it deems it contrary to laws and regulations, with a duly motivated decision.

7. Data access

The CAD teams organize regular discussions with the project leader to establish a provisional timeline for data access, taking into account the CAD's workload and the date the application file is finalized. This includes, in particular, the following elements: funding, obtaining regulatory authorizations from the CNIL (such as a declaration of compliance with a reference methodology, authorization in case of

non-compliance with a reference methodology, or in the case of data set matching), and, where applicable, obtaining a favourable notice from the Committee for the Ethical and Scientific Review of Health Research Projects (CESRES – Comité d'Évaluation Scientifique et Éthique pour la Recherche en Santé).

Once the project is finalized, the project leader signs a commitment document (available on the CAD website) and sends it to the CAD Central Contact. The project leader commits to:

- Write a summary of the research project in language understandable to the general public for online publication on the CAD website. ;
- Use the data solely for the purposes described in the project and not transferring the data by any means;
- At the end of the project, respect the intended use of the results, as these data is still considered sensitive data;
- Writing a plain-language summary of the results for online publication;
- Publish results in open-access journals or deposit publications in the HAL open archive;
- Share results and enrich CAD data warehouse with these results.;
- Comply with the PFMG2025 & CAD Publication Charter.

These obligations are formalized in a contract between the institution sponsoring the research and the CAD.

FUNCTIONING OF THE CAD SCIENTIFIC AND ETHICS COMMITTEE (CSE)

As required by regulations on health data warehouses, a Scientific and Ethics Committee was established to evaluate access requests to EDS CAD data. The CSE is responsible for validating research projects reusing data from PFMG2025 hosted in the CAD. It is attached to the GIP CAD.

1. CSE's Missions

As outlined in the CAD Internal Regulations, the CSE's missions are to:

- Provide an opinion on the methodology used, the necessity of using personal data, and the scientific and ethical relevance of the project;
- Monitor studies and evaluations using CAD health data;
- Recommend research projects that could be conducted using CAD data;
- Offer to the CAD Strategic Committee of the Data Warehouse an expression of needs, particularly with regard to the secondary use of health data.
- Provide opinions on issues submitted by CAD's general management.

8. CSE's Composition

8.1. Expertise of Members

The CSE is multidisciplinary and includes a maximum of twenty members, in addition to the Chair. Expertise areas include:

- Patient experience with rare diseases and/or cancer;
- Civil society and health system experience;
- Legal expertise in genetics and health data;
- Social sciences research related to genetics;
- Public health research;
- Oncology and rare disease research;
- Ethics;
- Bioinformatics and data analysis;

- Clinical and care experience in oncology, rare diseases, and genomics applications.

Observers may include:

- CSE Secretariat staff (CAD personnel);
- A CAD support service representative;
- A member of CAD general management;
- A PFMG governance representative;
- CAD legal staff and/or data privacy officer;
- Others, with justification.

A CSE member may fulfill multiple roles but only one per meeting to preserve balanced deliberation.

External experts may be invited by the Chair and are subject to obligations under Article L.1452-3 of the French Public Health Code.

The CSE may consult representatives of the data-providing services concerned.

8.2. Appointment of Members

Permanent members are appointed by the CAD Director General and serve in a personal capacity. They may not be replaced or represented.

CSE members are appointed for five years, renewable once.

Two members, elected by peers, serve as Chair and Vice-Chair for the term's duration.

Replacements occur when needed, ensuring gender balance and complementary profiles.

In case of resignation or death, replacements serve the remaining term.

8.3. CSE's Chair and Vice-Chair

The CSE elects a Chair and Vice-Chair from among its members.

Any member may stand as a candidate.

The Vice-Chair may represent the Chair externally and assign data access request evaluation.

8.4. CSE's Secretariat

A CAD staff member ensures the CSE's administrative management.

9. Confidentiality and Conflicts of Interest

Members sign confidentiality and commitment declarations at the start of their term.

They declare any conflicts of interest related to cases handled by the CSE, either on the Ministry of Health's "DPI – Site Unique" or directly to the CAD Secretariat, and must keep them up to date.

Participation in CSE meetings requires a current conflict of interest declaration.

Members involved directly or indirectly in a project under review must inform the Secretariat and abstain from its evaluation.

10.Activity Monitoring

The CSE Secretariat maps all submitted projects annually.

This is presented to the PFMG2025 COMOP, CAD Strategic Committee, and General Assembly.

An annual oral presentation on project progress is also organized for CSE members and the PFMG2025 coordination team.