

## **PRIVACY POLICY**

Processing of the personal data of PlusTerveys Hammaslääkärit Oy's customers and marketing-related personal data

### **1 WHO PROCESSES YOUR DATA?**

PlusTerveys Hammaslääkärit Oy (business ID: 2630918-8, address Malmin asematie 6, FI-00700 Helsinki, Finland, hereinafter referred to as "we") will process your personal data when you visit a dental clinic of PlusTerveys Hammaslääkärit Oy, use the services of the dental clinic or other services of a dentist employed by PlusTerveys Hammaslääkärit Oy or use the online services provided by PlusTerveys Group.

### **2 CONTACT INFORMATION OF THE DATA PROTECTION OFFICER**

The Data Protection Officer is Petri Hammar, and his contact details are:

PlusTerveys Hammaslääkärit Oy  
Tietosuojavastaava  
Malmin asematie 6, FI-00700 Helsinki, Finland  
tietosuoja@plusterveys.fi

Please contact the data protection officer if you have any questions about data protection or if you want to exercise your rights.

### **3 TYPES OF PROCESSED PERSONAL DATA**

We will process the following information required for managing the customer relationship and for marketing purposes:

The basic information you have provided, such as:

- name
- personal identification number
- customer number, as identifying data internal to the system
- language
- contact information: address, telephone number and e-mail address
- In addition to these, the job title of a corporate customer or their contact person

Data related to customer relationship:

- information concerning the use of our services and purchases as well as information on professionals and clinics
- information on requesting and submitting a tender concerning our services
- information on your preferred method of payment (incl. information on whether you will use the financing services of our partner and information on the financing decision)

- contact details when the customer contacts our various service channels, such as our clinics, customer service centre and online services, including recording telephone calls to the customer service centre and answering services
- personally produced content, such as customer satisfaction and other feedback as well as additional information and similar information provided by you
- information concerning insurance and occupational dental care agreement
- information on individuals participating in your care
- your consents, direct marketing consents and refusals
- information on K-Plussa membership potentially provided by you
- Information related to the use of identification and authentication devices and services
- customer satisfaction surveys sent to you
- your complaints and reminders and their related statements and reports, with the exception of patient complaints that are processed as patient data

If you use our online services, the following information will also be collected:

- Location data. We may display available appointments at the nearest clinics based on the user's location data. The user is separately asked for permission to use their location data. The services can also be used without accepting the use of location data.
- Ad tracking. We use ad tracking to monitor the effectiveness of advertising. This function helps identify ads most suited for consumers and most functional for PlusTerveys.
- Analytics. We use analytics to monitor the use of the site in order to understand how people use our site and how to develop the site accordingly. Our goal is to provide better services to the users of our site.
- Social media. We monitor PlusTerveys content shared in social media (e.g. Facebook). This helps us produce content that interests consumers and is actively shared in social media.

We provide more detailed descriptions of the features supporting the development of the services, marketing and functionality for each separate service.

You are required to provide your basic information before you use our services.

As some of our clinics record their video surveillance, your visits to those clinics will be recorded on video. We use video surveillance to ensure the safety of our patients and employees.

#### **4 PURPOSES OF PROCESSING YOUR PERSONAL DATA**

We will process your personal data to manage, monitor and develop your customer relationship, including customer communications. We will also use your data for the purposes of marketing and directed marketing. We may also process your personal data to conduct market and opinion research based on your consent.

We use pseudonymised personal data for analysing, categorising and reporting customer relationships and for developing our business operations, including training customer service staff and developing the quality of our customer service.

## **5 GROUNDS FOR PROCESSING YOUR PERSONAL DATA**

We will process your data in order to prepare and implement agreements concerning services performed by us and to provide a tender requested by you.

We will also process your data on the basis of legitimate interest resulting from the customer relationship.

Furthermore, we may process your personal data based on a legal obligation or your consent.

## **6 DISCLOSURE OF YOUR PERSONAL DATA**

We will only disclose your personal data within the restrictions allowed and required by legislation valid at each time. As a rule, we will not disclose your data to third parties. With your consent, we will disclose information on your use of our services (date, price) to your employer, if you are using our services on the basis of an occupational dental care agreement, as well as information on your treatment to the insurance company reimbursing your dental care costs. If you have applied for Santander financing for your treatment, we will disclose the total price of the treatment to Santander Consumer Finance Oy.

We have outsourced some of the processing of personal data to the following service providers who will process your personal data on our behalf:

- Maintenance and development of the EMR system we use to administer the customer information in accordance with this privacy policy
  - Entteri Professional Software Oy
- User support of information systems
  - Inmics Oy
- Administration and development of the website
  - Karhu Helsinki Oy
- Website analytics, marketing design, media design and procurements
  - Quru Oy

- Mainostoimisto SEK Oy
- Mediatoimisto Voitto Oy
- Maintenance and development of the PlusPalvelu service
  - Eficode Oy
- Contact requests and customer satisfaction surveys
  - Surveypal Oy
- Sending newsletters and newsletter address register
  - Liana Technologies Oy
- For our partner clinics in whose facilities our dentists are operating

Our websites use cookies from Google, Facebook and Twitter. These are detailed in the service-specific descriptions. Data collected by the cookies may be stored on the servers of the aforementioned operators that may be located outside the EU or EEA area and are, therefore, subject to their local data protection legislation.

## **7 TRANSFER OF YOUR PERSONAL DATA TO THIRD COUNTRIES**

We will not transfer your personal data outside the EU or the EEA area.

## **8 STORAGE PERIOD OF YOUR PERSONAL DATA**

We will store the personal data for no longer than is necessary for the purposes for which the personal data are processed or for the discharge of obligations laid down by law. In specifying storage periods, we take into account matters such as limitations of action enabled by legislation.

Primarily, we will store your customer data for four full calendar years after your latest visit to one of our clinics.

We will not store video surveillance recordings for more than one year after the date of recording.

## **9 YOUR RIGHTS**

### **9.1 Right of access to personal data**

You have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed. You also have the right of access to personal data concerning you and information on the processing of your personal data in accordance with the General Data Protection Regulation.

When you exercise your right of access to the data, we will send you a copy of your personal data processed by us. If you ask for several copies during a calendar year, we may charge a reasonable fee based on administrative costs.

## **9.2 Right to rectification**

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

## **9.3 Right to erasure**

You have the right to obtain from us the erasure of personal data concerning you without undue delay if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw consent on which the processing is based and where there is no other legal ground for the processing;
- you object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, and there are no legitimate grounds for the processing, or you object to processing of personal data concerning you for direct marketing purposes;
- we have processed the personal data unlawfully; or
- the personal data have to be erased for compliance with a legal obligation.

## **9.4 Right to restriction of processing**

You have the right to obtain from us restriction of processing so that, in addition to storage, your personal data may only be processed with your consent or for the establishment, exercise or defence of legal claims or to project the rights of another person, where:

- you contest the accuracy of the personal data, whereupon the processing will be restricted for a period enabling us to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; or
- you have objected, on grounds relating to your particular situation, to processing of personal data concerning you and are waiting for a decision on whether our legitimate grounds for the processing override the grounds for your objection.

## **9.5 Right to data portability**

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where:

- the processing is carried out by automated means; and

- the processing is based on your consent or necessary for the performance of a contract between us or in order to take steps at your request prior to entering into a contract.

The right to data portability is restricted to a procedure that will not adversely affect the rights and freedoms of others.

## **9.6 Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, if there are no legitimate grounds for the processing.

You have the right to object to the processing of your personal data for direct marketing purposes. [You can block electronic direct marketing by clicking on the link '[peruuta markkinointiviestien tilaus](#)' (unsubscribe from marketing messages) in the messages.]

## **9.7 Right to withdraw consent**

Where processing is based on your consent, you have the right to withdraw your consent to the processing of personal data at any time.

You can withdraw your consent by contacting our data protection contact person: tietosuoja@plusterveys.fi.

## **9.8 How to exercise your rights**

You can exercise your rights by contacting the data protection officer.

## **10 RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

You have the right to lodge a complaint with the data protection ombudsman if you consider that your rights under the General Data Protection Regulation are infringed in the processing of your personal data.

## **11 SOURCES OF YOUR PERSONAL DATA**

We primarily obtain your personal data from you, and customer data is also collected as described above when you use our services.

If you have applied for Santander financing for your dental care, we will receive information from Santander Consumer Finance Oy on the acceptance of the financing decision, the maximum sum or the refusal of financing.

## **12 INFORMATION SECURITY IN PROCESSING PERSONAL DATA**

We store your personal data in systems protected with firewalls, passwords and other technological and organisational means generally accepted across the industry at each time.

Our manually administered materials are located in facilities not accessible to unauthorised individuals.

Only our employees who are required to process personal data by their work-related duties have access to the personal data processed by us.