

## **PRIVACY POLICY**

Processing of patient data at PlusTerveys Lääkärit Oy

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

PlusTerveys Lääkärit Oy (business ID: 0361675-9, address Malmin asematie 6, FI-00700 Helsinki, Finland, hereinafter referred to as "we") will process your personal data when you use the services of a PlusTerveys Lääkärit Oy clinic or other services of a physician employed by PlusTerveys Lääkärit Oy.

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

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

PlusTerveys Lääkärit 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 personal data necessary for your patient relationship and treatment:

The basic information you have provided, such as:

- name
- date of birth
- personal identification number
- contact information: address, municipality of residence, telephone number and e-mail address
- preferred language
- guardian, other legal representative or appointed contact person and their contact information
- your preferred clinic and physician

Administrative information and patient invoicing data:

- your consents (e.g. sending invitations, data disclosure)
- appointment information
- invitation information
- invoicing information

Information describing the patient's health and treatment:

- anamnesis and initial situation
- treatment information: planning, implementation and assessment of treatment
- results of clinical and radiological examination
- medical risk information
- information related to monitoring state of health
- certificates, statements and potential patient complaints containing health-related information

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

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

We will process your personal data to plan, organise and implement your treatment and examinations. Personal data will also be processed to plan our operations and compile statistics as well as for other purposes in accordance with valid legislation and consents, such as medical research under a pseudonym.

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

We will process your personal data based on a legal obligation or your consent.

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

Patient data is confidential. Only the health care professionals participating in the patient's care will have access to the patient data. Our employees are bound by an obligation of secrecy.

In order to organise your examinations and treatment, we can disclose the necessary data to another health care unit specified by you, based on your oral consent, consent evident from context or consent marked in patient documents.

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 treatment to the insurance company reimbursing the costs of your care.

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 patient information in accordance with this privacy policy
  - Tieto Healthcare & Welfare Oy
- User support of information systems
  - Inmics Oy
- For a video connection opened with your permission, your name and email address
  - VideoVisit Oy

- For our partner clinics in whose facilities our physicians are operating

## **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 store patient data in accordance with legislation valid at each time. The storage of patient documents is stipulated in the Finnish Act on the Status and Rights of Patients (785/1992) and the Decree of the Finnish Ministry of Social Affairs and Health on Patient Documents (298/2009). Patient documents are primarily stored for 12 years after the patient's death or, if unknown, 120 years after their birth.

## **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.

#### **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.

You must present your request of exercising your rights personally at our clinic so that we can verify your identity with your identification card.

The obligation to prepare and store patient documents is based on the Finnish Act on the Status and Rights of Patients (785/1992) which may restrict the use of your rights in accordance with data protection legislation.

## **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 may, with your consent, also receive data from other health care units. The health care professionals participating in your care store any data formed on the basis of examinations and treatment in the patient data file.

## **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.