

DATA PROTECTION DESCRIPTION OF THE MYHELTTI SERVICE

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1 CONTROLLER

Heltti Oy

Business ID: 2544593-8

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2 CONTACT PERSON FOR REGISTER QUERIES

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3 NAME OF THE REGISTER

MyHeltti

4 PURPOSE OF PROCESSING THE PERSONAL DATA

The MyHeltti Service (later also referred to as the service) is directed to the employees of Heltti's occupational health care customer companies, i.e. Heltti's members. In addition, also another person, having agreed with Heltti on the registration to the service, may use the service.

The processing of personal data is based on the data subject's consent when the data subject registers to the service and enters to the MyHeltti Service information on his or her wellbeing, state of health or earlier treatment history.

Personal data is processed for the implementation and provision of the browser and/or application-based MyHeltti Service offered by Heltti, and for providing Heltti's services.

Heltti can use personal data for the purpose of creating, monitoring and analysing member history, feedback, satisfaction data, surveys and research; for allocating communications, marketing and services and organising, developing and offering other services, and for purposes of profiling as described in more detail in Section 11 of this data protection description. The service can contain

marketing communications via phone, text message, e-mail or other corresponding messaging, and service-internal marketing and other communications.

Processing tasks can be outsourced to external service providers in accordance with and within the limits set by the data protection legislation.

5 REGISTER'S DATA CONTENT

Information stored on the data subject may include, inter alia, the following:

Name, nickname, identity code, member number, sex, language, address, telephone number, e-mail address, and other necessary contact information.

Information on the services desired, used or purchased by the data subject, as well as an entry concerning service in force from time to time.

The information stored by the data subject her or himself, such as wellbeing and health information, information on treatment carried out elsewhere than Heltti, areas of interest, information on hobbies, or other equivalent data.

Information on the staff who have treated the data subject. Wishes or notes related to healthcare professionals, services, clinics, and other issues.

Information on prohibitions, restrictions, consents and other choices made by the data subject regarding the use of personal data.

Information necessary for the use of authentication and verification tools and services.

Information on the processing of data, such as the storage date and the information source.

Information on the communications between the data subject and Heltti's healthcare professional in the MyHeltti Service, such as the content of messages and their sending times.

Other information related to the purpose of the register, including data that can be connected to the data subject gathered on the use of the webpages during use of a service, such as the user's IP address, the time of visit, the pages viewed, the browser used, and the URL and server from which the user accessed the site.

The MyHeltti register does not contain any patient data, and the data subject is only granted a limited access right to her or his patient data. The communications between the data subject and Heltti's healthcare professional in the MyHeltti Service are considered part of Heltti's patient data register. No other data stored in the MyHeltti Service are transferred into the patient data register, unless the data subject has given her or his specific consent thereto. The information stored in the MyHeltti Service by the data subject her or himself, such as wellbeing or health information or information from wellbeing applications or other sources connected by the data subject to the MyHeltti Service, are not accessible by Heltti's health care professionals unless, during a treatment appointment, the data subject separately gives a specific consent thereto. The health care professional will then save the data to be used during the treatment from the MyHeltti Service to a separate patient data register.

6 STORAGE TIME OF PERSONAL DATA

Heltti will store the personal data in the MyHeltti Service for as long as the data subject uses the MyHeltti Service, i.e., for as long as the data subject has a user account in the service. Heltti may also erase the data before this, if it becomes clear that the user no longer uses the service and his or her relationship with Heltti has also otherwise ended.

7 REGULAR SOURCES OF INFORMATION

Information is received primarily from the following sources:

The data subject her or himself, and the information generated by the data subject's use of the MyHeltti Service.

The wellbeing and other applications that the data subject has connected to the MyHeltti Service.
Heltti's member register.

Parties offering services related to authentication, verification, address data, updates or similar services.

Also information provided by Heltti's other partners, such as insurance companies, can be added to the register.

The population register system of the Population Register Centre and other known systems.

8 REGULAR DISCLOSURE OF DATA AND THE RECIPIENT GROUPS

Information may be submitted to Heltti's member register and direct marketing register.

Data will not be disclosed to parties other than those participating in the production, development, or maintenance of services or communications of Heltti or on its behalf, except when based on an agreement, separate consent, and/or explicit regulations.

9 TRANSFER OF DATA OUTSIDE THE EU OR THE EEA

Members health data will never be transferred outside the EU or EEA. Other personal information can be transferred outside the European union or the European Economic Area, for example, to the United States, in accordance with the data protection legislation and the restrictions set therein.

10 PRINCIPLES IN ACCORDANCE WITH WHICH THE DATA FILE HAS BEEN PROTECTED

A Physical material

The register contains no physical material.

B Electronically processed data

The MyHeltti Service operates via the Internet and can be used via protected data-communication media, such as those used with a browser on a computer, mobile device or other smart device, or with another technical application provided by Heltti at any given time.

The user logs in to the MyHeltti Service by using the authentication method approved of by Heltti from time to time. Heltti provides the service and its information security by means of appropriate technical solutions.

Material can only be accessed by employees, practitioners or co-operation partners specifically entitled to do so with a personal user ID and password. There are different levels of access rights, and each user is issued sufficient rights, though as limited as possible, to complete his or her work tasks. In addition, the data subject can agree with the healthcare professional that during the treatment appointment, the healthcare professional will have access to the data subject's data stored in the MyHeltti service, such as health information stored by the data subject him or herself.

When a user terminates his or her MyHeltti Service account, Heltti will remove all information related to MyHeltti Service that the user has saved personally and also the user's MyHeltti profile, but information related to other services (such as feedback and information used for allocation of services) will be transferred to and/or will remain in Heltti's member register.

The purpose of the measures described above is to ensure the confidentiality of the MyHeltti Service and the availability and integrity of its data, and the fulfillment of the rights of the data subjects.

11 PROFILING

As part of the processing activities of personal information saved in the MyHeltti Service, Heltti can also utilise the information for purposes of profiling. Profiling is implemented by creating a member ID for the data subject for the purpose of combining various data on the data subject created during the use of the service. After this, a profile created as described above can be, inter alia, compared to profiles created on other data subjects.

The purpose of profiling is to determine user behaviour and the demand for services and to target Heltti's services.

12 THE DATA SUBJECT'S RIGHT TO PROHIBIT THE PROCESSING OF PERSONAL DATA

The data subject has the right to prohibit her or his profiling and other processing activities which Heltti may direct on the data subject's personal data to the extent that the grounds for the processing of information is the customer relationship between Heltti and the data subject. The data subject may present his or her demand regarding the prohibition in accordance with Section 15 of this data protection description. In connection with the request, the data subject is required to identify the special situation, on the basis of which she or he objects to the processing of data. Heltti may refuse to implement the request for prohibition on statutory grounds.

13 THE DATA SUBJECT'S RIGHT TO PROHIBIT DIRECT MARKETING

The MyHeltti Service may contain advertisements by Heltti or its partners. The user cannot prohibit the occurrence of adverts in the service.

The data subject may give channel-specific consent or prohibitions in the MyHeltti Service regarding service-external direct marketing, including profiling for direct marketing purposes.

14 OTHER RIGHTS OF THE DATA SUBJECT REGARDING THE PROCESSING OF PERSONAL DATA

14.1 The data subject's right of access to the data

When logging in to the MyHeltti Service, the data subject can view most of the data included on her or him in the MyHeltti Service.

The data subject also has the right to inspect what other information on him or her has been stored in the MyHeltti Service. Such an inspection request must be made in accordance with Section 15 of this data protection description. The right to inspection may be declined on statutory grounds. In principal, there shall be no charge for exercising the right to inspect.

14.2 The data subject's right to demand rectification or erasing of data or a restriction on processing data

The data subject can also update herself or his basic information contained in the MyHeltti Service. To the extent the data subject can act herself or himself, after having been informed of an error in the data or having detected such an error herself or himself, the data subject is required, without undue delay, on her or his own initiative, rectify, erase, or supplement the erroneous, unnecessary, incomplete or obsolete personal data or the data contrary to the purpose of the MyHeltti Service.

To the extent the data subject cannot rectify the data herself or himself, the rectification request is made in accordance with Section 15 of this data protection description.

The data subject also has the right to demand the Heltti to restrict the processing of her or his personal data, for example, in a situation where the data subject is waiting for Heltti's response to her or his request to rectify or erase data.

14.3 The data subject's right to transfer data from one system to another

To the extent the data subject herself or himself has provided information in the MyHeltti Service for processing on the basis of the data subject's consent, the data subject has the right to access such data mainly in machine-readable format and the right to transfer such data to another controller. In practice, such information includes the data on the data subject's wellbeing or health stored by the data subject herself or himself in the MyHeltti Service.

14.4 The data subject's right to make a complaint to the supervising authorities

The data subject has the right to make a complaint to the competent supervising authorities, if the controller has not followed the applicable data-protection regulations in its operations.

14.5 Other rights

If Heltti processes the personal data on the basis of the data subject's consent, the data subject has the right to cancel the consent by notifying Heltti of this in accordance with Section 15 of this data protection description.

15 CONTACTS

In all matters related to the processing of personal data and all situations regarding the exercising of one's own rights, the data subject should contact Heltti in the MyHeltti Service, in person at a Heltti service point, or by post at the address: Heltti Oy / Data Protection, Mannerheimintie 12 A, 00100 Helsinki, Finland. When required, Heltti can request the data subject to further define their request in writing, and, if needed, the identity of the data subject can be authenticated before initiating any other measures.

