

DATA PROTECTION DESCRIPTION OF HELTTI'S MEMBER REGISTER

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1 CONTROLLER

Heltti Oy

Business ID: 2544593-8

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www.heltti.fi

2 CONTACT PERSON FOR REGISTER QUERIES

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3 NAME OF THE REGISTER

Heltti's Member Register

4 BASIS AND PURPOSE OF PROCESSING THE PERSONAL DATA

The processing of personal data is based on the customer relationship between Heltti and its customer, i.e. Heltti's member, the data subject's consent, assignment given by the data subject or other appropriate contact.

Personal data may be processed for the following purposes:

Managing, execution, development and monitoring of customer relationship, customer service and thereto-related communications and marketing.

Analyzing, grouping, reporting of customer and member relationships, offering of member benefits and other purposes relating to membership and development of Heltti's business.

Collecting and processing of feedback and information on member's satisfaction.

Implementation of marketing research and opinion surveys.

Profiling purposes described in Section 11 of this Data Protection Description.

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, personal 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 information on the services in force from time to time. Information on execution of marketing and communications in different channels, such as web services and automated services, including recording of calls in customer service center.

The information stored by the data subject her or himself, such as customer feedback and the additional information issued by the data subject, including wishes on membership, customer satisfaction, interests, hobbies and other equivalent data.

Information on data subject's eventual insurance coverage and other corresponding information.

The membership benefits desired and used by the data subject, including information on payments.

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 on the prohibitions, limitations, consents and other choices relating to personal data.

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.

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.

Heltti's Member Register does not contain any patient data, which are stored in Heltti's Patient Register separate from Heltti's Member Register. No data stored in Heltti's Member Register is transferred into Heltti's Patient Register, unless the data subject has given her or his specific consent thereto. The information stored in Heltti's Member Register by the data subject her or himself, such as wellbeing or health information or information from wellbeing applications or other sources, is 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 to Heltti's Member Register.

6 STORAGE TIME OF PERSONAL DATA

Heltti will store the personal data in Heltti's Member Register until the customer relationship between the data subject and Heltti is considered to have ended. The customer relationship is deemed to have ended when the data subject is ceased to be a user of Heltti's healthcare and/or wellbeing services and it has become evident that the data subject is neither otherwise continuing the use of Heltti's services.

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 membership, use of services, communications and transactions.

The wellbeing and other applications that the data subject has connected to Heltti's systems.

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 the MyHeltti Register, Heltti's Direct Marketing Register and Heltti's other personal data registers, however, always in accordance with and within the limits set by the data protection legislation.

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

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

Digital data 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 a healthcare professional that during the treatment appointment, the healthcare professional will have access to the data subject's data stored in Heltti's Member Register, such as health information stored by the data subject him or herself.

11 PROFILING

As part of the processing activities of personal information stored in Heltti's Member Register, 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 data subject may give channel-specific consent or prohibitions to Heltti regarding 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

The data subject has the right to inspect what information on him or her has been stored in Heltti's Member Register. 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. As a general rule, 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

If the data subject is a user of the MyHeltti Service, the data subject can update herself or himself 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 to Heltti's Member Register 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, by e-mail at privacy@heltti.fi, 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.