

DATA PROTECTION DESCRIPTION OF HELTTI'S PATIENT REGISTER

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1 CONTROLLER

Heltti Oy

Business ID: 2544593-8

Mannerheimintie 12 A, 00100 Helsinki

www.heltti.fi

2 CONTACT PERSON FOR REGISTER QUERIES

Data Protection Manager Juulia Kaipainen

Mannerheimintie 12 A, 00100 Helsinki

juulia.kaipainen@heltti.fi

3 NAME OF THE REGISTER

Heltti's Patient Register

4 BASIS AND PURPOSE OF PROCESSING THE PERSONAL DATA

The processing of patient records is based on law (e.g. Patient Act 785/1992, Medical Records Decree 298/2009 and Secondary Act 552/2019) or the patient's consent. The processing is carried out in accordance with the EU's General Data Protection Regulation (GDPR).

The data stored in Heltti's Patient Register is processed for the purposes providing care to Heltti's customers, i.e. Heltti's members, and for other statutory or consent-based purposes.

5 REGISTER'S DATA CONTENT

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

Name, personal identity code and contact information.

The data subject's employer and the possible health risks connected to the workplace.

Information necessary for organizing, planning, implementing and monitoring the data subject's care, such as preliminary information and health data gathered during examinations and treatment.

Other information necessary for treatment and recorded by a medical professional.

Eventual information disclosure of data and the basis therefor.

Information on the medical professionals participating in the care of the data subject and information on the data subject's appointments are stored as a sub-register to Heltti's Patient Register.

The results of the laboratory, X-ray and cardiac examinations performed for the data subject are stored as a sub-register of Heltti's Patient Register.

6 STORAGE TIME OF PERSONAL DATA

Heltti stores the personal data in Heltti's Patient Register in accordance with the applicable legislation on the storage times of patient data.

7 REGULAR SOURCES OF INFORMATION

Information is received primarily from the following sources:

The data subject herself or himself.

The medical staff and healthcare professionals.

With the data subject's consent, data can also be obtained from other health care units or professionals, inter alia, via the National Patient Data Repository (KANTA).

8 REGULAR DISCLOSURE OF DATA AND THE RECIPIENT GROUPS

The patient data of Heltti's members stored in Heltti's Patient Register is confidential, and Heltti's staff has the obligation to maintain such data's confidentiality.

Patient data can be transferred only:

- (i) with the data subject's consent; or
- (ii) pursuant to specific applicable legislation.

Heltti has the right to transfer patient data to the Finnish National Institute for Health and Welfare and the Finnish Medicines Agency Fimea for the purposes of research, planning, statistics and supervisory tasks, and to Fimea for the purposes of narcotics control.

In addition, Heltti may transfer patient data for the purposes described below:

- (i) In case of further examinations, the patient records may be submitted to another healthcare operations unit or healthcare professional appointed by the data subject with the data subject's verbal consent registered in the patient documents.
- (ii) Information necessary for arranging and implementing the data subject's examination and treatment by another Finnish or foreign healthcare operations unit or healthcare

professional can also be submitted to such unit or person if, on the basis of mental disturbance, mental disability or similar factor, the data subject is not able to evaluate the significance of the consent and she or he does not have a legal representative, or if, due to the data subject being unconscious or there being comparable circumstances, consent cannot be obtained.

- (iii) The National Patient Data Repository (KANTA).
- (iv) Information may be transferred to an insurance company with the data subject's written consent or based on specific legislation.
- (v) The data subject's guardian, other legal representative or next of kin, if the data subject has consented to this.
- (vi) In addition, if data subject is being treated as a result of unconsciousness or comparable reason, the data subject's identity and information on her or his health may be disclosed to the data subject's next of kin or another person close to her or him, unless there are reasons to assume that the data subject would prohibit this.

9 TRANSFER OF DATA OUTSIDE THE EU OR THE EEA

Personal information in Heltti's Patient Register will not be transferred outside the European union or the European Economic Area.

10 PRINCIPLES OF PROTECTING THE REGISTER

Pursuant to legislation, the patient data stored In Heltti's Patient Register is confidential. Patient data may not be submitted to third parties.

Patient records stored in Heltti's Patient Register may be used only by Heltti's employees people otherwise working for Heltti and treating the data subject or participating in the treatment of the data subject. Heltti's management grants access rights to Heltti's Patient Register to these persons to the extent required by their duties.

The register contains no manual paper documentation. Digitally stored information can be accessed only by authorized employees with their personal user IDs and passwords. The use of patient records is supervised via monitoring of log information.

11 RIGHTS OF THE DATA SUBJECT REGARDING THE PROCESSING OF PERSONAL DATA

11.1 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 Patient Register. Such an inspection request must be made in accordance with Section 12 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.

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

Heltti has the obligation, without unnecessary delay and at its own initiative, to correct, erase or supplement any erroneous, incomplete or obsolete information in Heltti's Patient Register.

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.

Rectification of data and restriction of processing is implemented as follows:

- The data subject makes a rectification request and request for restricting the processing of data in writing and addresses such request to Heltti in accordance with Section 12 of this data protection description. In addition, the data subject always personally delivers the request to Heltti's service center. The data subject's identity will then be authenticated using a reliable method.
- If the data subject's request is considered justified, the correction and possible procedures to restrict processing will be made by a person who has the specific right to correct the patient records.
- Eventual incorrect entries are transferred to a background file in such manner that both the erroneous and correct entry can be later read. The name and position of the person making the correction and the grounds for the correction are entered in the patient records.

11.3 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.

11.4 The National Patient Data Repository (KANTA)

Heltti is in the process of joining the National Patient Data Repository, i.e. the KANTA repository. All patient data generated to Heltti's Patient Register after Heltti having joined the KANTA repository will be transferred to the KANTA repository. The data subject is required to manage such data via the My Kanta Online System (OMAKANTA).

12 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.