

# DATA PROTECTION DESCRIPTION OF HELTTI'S PATIENT REGISTER

Date: 3 April 2023

## 1 CONTROLLER

In health care services provided by Heltti, such as occupational health care services, the data controller is Heltti Oy or other Heltti group company, such as Shortum Oy. All data controllers are contacted through Heltti:

Heltti Oy  
Business ID: 2544593-8  
Mannerheimintie 12 A, 00100 Helsinki  
[heltti.fi](https://heltti.fi)

Health care services provided by a private practitioner operating in Heltti or a company on behalf of which the private practitioner operates:

The private practitioner treating the patient (or a company on behalf of which the practitioner operates) is the data controller. The private practitioner has assigned the technical maintenance of the patient register to Heltti.

## 2 CONTACT PERSON FOR REGISTER QUERIES

Data Protection Manager Juulia Kaipainen  
Mannerheimintie 12 A, 00100 Helsinki  
[juulia.kaipainen@heltti.fi](mailto: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 for providing health care as well as occupational health care services is based on law (e.g. Patient Act 785/1992, Medical Records Decree 94/2022 and Secondary Act 552/2019) or the data subject'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 utilized for the organization, planning, implementation and monitoring of care for Heltti's customers, i.e. Heltti's members, as well as for patient management and for other statutory or consent-based purposes. For the purposes of providing occupational health services, the data stored may also be utilized for evaluation of employee's work ability as well as for planning and implementation of occupational health action plan.

Occupational health care patient records are kept separately from private practice patient records so that the use of these records for other than occupational health care requires the data subject's consent. Administrative medical records are stored separately from patient records.

In accordance with the Secondary Act, patient records may be used for, inter alia, necessary knowledge management, authority supervising, R&D as well as innovation purposes and possible scientific research with a separate consent.

As a part of providing health care and occupational health services, we may automatically analyze patient records generated in connection with the use and implementation of health care services in order to assess an employee's need for support and to promote work ability and health (profiling, see also Section 11).

## **5 REGISTER'S DATA CONTENT**

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

- Name, personal identity code, contact information, language, profession as well as other identification information (e.g. copy of passport if needed).
- The data subject's designated next of kin or legal representative, guardian of a minor patient, including their contact information.
- 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.
- The occupational health patient register also includes the data subject's employer and the possible health risks connected to the workplace.
- Other information necessary for treatment and recorded by a medical professional.
- Information on any disclosure of data and the grounds for such disclosure.
- Information on whether the data subject permits private physicians treating them at Heltti to see the medical history in the occupational health patient register when this is necessary for their treatment.
- 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 records. The storage period for medical records is set out in the Decree of the Ministry of Social Affairs and Health on Medical Records (94/2022). As a rule, the period is 12 years from the death of the data subject or, if this information is not available, 120 years from their birth.

## **7 REGULAR SOURCES OF INFORMATION**

Information is received primarily from the following sources:

The data subject herself or himself, their guardian or other legal representative.

The medical staff and healthcare professionals.

The occupational health medical records includes information received from an employer, such as the basic information of a data subject, contact information of the workplace as well as other possible information in accordance with the occupational health care agreement.

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). Other health care professional may inspect patient records through the National Patient Data Repository in accordance with the consents and prohibitions set out by the data subject. Such consents and prohibitions are maintained by the data subject via the National Patient Data Repository.

## **8 REGULAR DISCLOSURE OF DATA AND THE RECIPIENT GROUPS**

The patient records of Heltti's members stored in Heltti's Patient Register are confidential, and Heltti's personnel has the obligation to maintain such confidentiality of patient records.

Patient records can only be transferred:

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

Regular recipients of data include the following:

- (i) the Prescription Centre of Kela (Kela operates as the contact point for all data subjects with regard to the Prescription Centre);
- (ii) the Patient Data Repository KANTA (in accordance with the law on electronic processing of customer information in the health care and social welfare (784/2021));
- (iii) other health care authorities which have a statutory right to receive health data due to their authority functions, such as the Finnish National Institute for Health and Welfare, the Finnish Medicines Agency Fimea, the Finnish Social and Health Data Permit Authority (Findata) and the Social Insurance Institution of Finland (Kela).

In addition, Heltti may disclose patient records 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 records.
- (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) Information may be disclosed to an insurance company with the data subject's written consent or based on specific legislation.
- (iv) Information may be disclosed to the data subject's guardian, other legal representative or next of kin, if the data subject has consented to this. However, if a data subject who is a minor, on the basis of their age or level of development can decide on the treatment given to them, they have a right to refuse the disclosure of information on their state of health and care to their guardian or other legal representative.

- (v) 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 LOCATION AND TRANSFERS OF PATIENT RECORDS OUTSIDE THE EU OR THE EEA**

Personal data in Heltti's Patient Register are primarily processed inside the European Union (EU) or the European Economic Area (EEA).

Personal data in Heltti's Patient Register will not be transferred outside the EU or the EEA.

Heltti may use subcontractors in its operations, to whom necessary data is transferred, for example, for diagnostic purposes. Such partners process personal data as processors of personal data on behalf of Heltti and in accordance with the instructions and orders provided by Heltti. We aim to primarily cooperate with partners operating within the EU/EEA.

## **10 PRINCIPLES OF PROTECTION OF THE REGISTER**

Pursuant to legislation, the patient records stored In Heltti's Patient Register are confidential. Patient records may not be disclosed to third parties.

Patient records stored in Heltti's Patient Register may only be used 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 does not contain manual paper documentation. Digitally stored information may only be accessed by authorized employees with their personal user IDs and passwords or professional ID cards. The use of patient records is supervised via monitoring of log information.

## **11 PROFILING**

As part of occupational health care services, in accordance with the Occupational Health Care Act and Decree and good occupational health care practice, and where applicable, based on explicit consent, Heltti may use the patient records generated in connection with the use of occupational health care services in order to assess an employee's need for support and to promote work ability and health. Such information generated in connection with the use of occupational health care services may be analyzed in an automated way in order to identify a person's need for support. The results of the analysis are only used by the occupational health care and they will not be disclosed, e.g. to the employer. Any further actions will be agreed with the data subject.

## **12 RIGHTS OF THE DATA SUBJECT REGARDING THE PROCESSING OF PERSONAL DATA**

### **12.1 The data subject's right of access to the data**

The data subject has the right to know whether his/hers personal data is being processed and inspect what information on him or her has been stored in Heltti's Patient Register. The data subject has the right to make an inspection request to Heltti.

Such an inspection request must be made in accordance with Section 13 of this data protection description. The right to inspection may be declined on statutory grounds. The information is provided by a physician or other healthcare professional who makes an entry in the patient register about the use of the right of inspection. The information is submitted to the data subject in written form. As a general rule, there shall be no charge for exercising the right to inspect.

## **12.2 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 at its own initiative or based on a data subject's demand, to correct, erase or supplement any erroneous, incomplete or obsolete information in Heltti's Patient Register.

The data subject has the right to demand erasing of personal data concerning her/him. Such erasure shall be implemented in accordance with applicable law. With regard to health information and medical records, Heltti has an obligation to store patient records in accordance with the Decree on Medical Records.

The data subject also has the right to demand 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. The data subject has a right to deny automatic analyzing (profiling) of her or his personal 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 13 of this data protection description. In addition, the data subject always personally delivers the request to a Heltti office. 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 as well as the date of and the grounds for the correction are entered in the patient records.

## **12.3 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 (in Finland the Office of the Data Protection Ombudsman), if the data subject regards that the data controller has not followed the applicable data-protection regulations in its operations. Instructions on the complaint are described at [tietosuoja.fi](https://tietosuoja.fi).

# **13 CONTACTS**

In all matters related to the processing of personal data and exercising of one's own rights, the data subject should contact Heltti in the MyHeltti Service, by e-mail at [privacy@heltti.fi](mailto: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.