

PATIENT REGISTER

I.E. PRIVACY POLICY FOR THE CLIENTS OF THE HAPPI HEALTH SERVICE

1. CONTROLLER

The data controller under the applicable data protection law is Happi Health (hereinafter also referred to as "we" "us" or "our"). Happi Health is responsible for ensuring that your personal data is processed in accordance with this Notice and applicable data protection laws.

Contact information of the controller: N Health Technology Oy (Happi Health), Business ID: 2966332-6
Address: Eerikinkatu 3 B, 00100 HELSINKI.

Data Protection Officer: Elina Saarenmaa, email: tietosuojaavastaava@terapiatalonoste.fi

2. COLLECTION OF PERSONAL DATA

We collect personal data directly from you. We collect and process personal data relating to patients that is necessary for the treatment relationship, such as:

- Patient's name, personal identification number, contact details.
- If necessary, a relative nominated by the patient.
- Name and contact details of the legal representative appointed for the adult patient.
- Name and contact details of the minor patient's guardian or other legal representative.
- Information necessary for the organisation of the patient's care, such as medical data generated during the examination and treatment, as well as necessary pretreatment data.
- Information on any disclosures and the grounds for such disclosures.

We pay particular attention to the careful and secure processing of personal data and follow and develop good data protection practices in the industry in general.

3. THE PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

The information stored in the patient register is used for the treatment of the patient and for other purposes in accordance with the law and consents. The purpose of medical records is to assist in the planning and implementation of patient care and to ensure continuity of care. According to Article 12 of the Act on the Status and Rights of Patients (785/1992), all information necessary to ensure the organisation, planning, implementation and monitoring of treatment is entered in patient records. At Happi Health, personal data are processed only by persons who are entitled to process them and have the appropriate job duties.

4. TRANSFERS AND DISCLOSURES OF PERSONAL DATA

Happi Health will not disclose your data to third parties, except with the consent of the data subject or on the basis of Article 13 of the law (785/1992). When we use partners in our services, we are also responsible for their activities in accordance with the General Data Protection Regulation. The regular data sources are the material collected from patient encounters, i.e. data obtained from the controller's own activities. Patients can provide their own data, or give their consent to obtain data from other record-keepers, such as other health services, for example through the National Health Record (KANTA). With the patient's consent, the data may be disclosed to a party identified by the patient. The data may also be disclosed under existing legislation. Data necessary for the organisation or implementation of the patient's research and treatment may be disclosed to another Finnish or foreign health care establishment or health care professional, even without the patient's consent, if the patient is not in a position to assess the meaning of the consent given

due to mental disorder, intellectual disability or other similar reasons and does not have a legal representative, or if consent cannot be obtained due to the patient's unconsciousness or other similar reasons. However, if a minor patient is capable, in view of his or her age and degree of development, of making decisions about his or her treatment, he or she has the right to refuse to disclose information about his or her state of health and treatment to his or her guardian or other legal representative. The request for surrender must be made in writing to the registry administrator. The transfer is the responsibility of the Director of Health Services. The data controller may not disclose the data itself.

5. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU OR ETA

Patient data may be transferred outside the EU or EEA in situations where the vital care of the patient necessarily requires the transfer of data.

6. STORAGE OF PERSONAL DATA

A) Manual data

Access to patient data is restricted to persons involved in the care of the patient or in related tasks in the relevant operational unit or on its behalf. Manual records shall be kept in locked and controlled premises.

B) Data processed by the ITC

Access to electronically processed data is only possible with the personal username and password of the authorised employee. Patient records are not stored on workstations. Access to patient data is controlled by monitoring log files.

7. RIGHTS OF THE DATA SUBJECT

The data subject has the right of inspection in accordance with the Personal Data Act. The information is provided by a healthcare professional who makes an entry in the follow-up register about the exercise of the right of inspection. The information is given to the patient in writing. The right of access may be refused only if the provision of the information could pose a serious risk to the health or treatment of the data subject or to the rights of another person. If the right of access is refused, the data subject will be given a certificate describing how to appeal against the decision. The data subject has the right to exercise the right of access free of charge once a year. More frequent use of the right of access will be charged at a reasonable cost. The controller is obliged to correct inaccurate information contained in the personal data file, both on his or her own initiative and at the request of the data subject. The request for correction does not always have to be in writing.

8. INFORMATION SECURITY

We take appropriate measures (including physical, digital and administrative measures) to protect personal data against loss, destruction, misuse and unauthorised access or disclosure. For example, access to personal data is limited to those persons who need it for the performance of their duties. Please note that even appropriate measures cannot prevent all possible security breaches. In the event of a personal data breach, we will notify you in accordance with applicable laws.

9. AMENDMENT OF THE SUMMARY

We reserve the right to amend this Statement as necessary. We will announce the change on our website.

10. CONTACT US

If you have any questions about this Notice or for more information about the processing of your personal data, please contact us by email at tietosuojavastaava@terapiatalonoste.fi