

PRIVACY POLICY (EU General Data Protection Regulation), articles 13 and 14)

The careful processing of your personal data is of great importance for us at Femeda Oy (hereinafter referred to as “Femeda”). In the activities of Femeda, the requirements of the European Union’s General Data Protection Regulation (EU/2016/679) and other applicable data protection legislation is adhered to.

This Privacy Policy describes the policies and practices of Femeda in regard to the personal data collected and used for its commercial activities. In addition, this Privacy Policy describes the ways in which you can affect the processing of your personal data.

1. Controller

Oy Femeda Ab
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2. Data Protection Officer

Tiina Helenius, Service Director
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3. Name of register

Centralised patient register of Oy Femeda Ab

4. Purpose of handling personal data

Femeda has a legal obligation to record health data obtained through organising and implementing treatment for its customers. Health data is used for the provision of treatment and services for customers. Medical records will only contain the data necessary for the intended use. The healthcare professional is obliged to record in the medical records the data necessary for treatment, even if the patient forbids the recording of such data.

We process personal data for the following purposes:

- For the provision of healthcare services: Assessment of service requirements, planning and implementation of patient examinations and treatment
- Implementation of archiving obligations
- For the purpose of planning, developing, monitoring and reporting Femeda’s own operations, and for compiling statistics related to its operations.
- For the implementation of statutes and regulations pertaining to private healthcare activities
- For the purpose of billing and debt collection
- For implementing customer service: processing of feedback and requests for clarification

Femeda uses a centralised patient registry. Using the basic data form, the customer provides consent for being included in the common register and permission for disclosing the data between the healthcare professionals of the medical facility who are participating in the treatment provided for this customer. The customer is entitled to refuse for their data to be held in the common register, which means that only that individual who has created the requirement for entering visit activity will have the right to record, read and disclose such data. Medical record entries made by psychiatrists and psychotherapists are only accessible by the individual who made the entries.

5. Legal basis of handling personal data

We collect personal data and health data pertaining to our customers that are necessary for assessing the need for treatment and for implementing other customer relations and services. Patient data is primarily collected from you during our customer relationship.

The collection of this data is based on the Private Health Care Act (152/1990). The data collected is classed as sensitive information and the processing of such adheres to Act on the Electronic Processing of Client Data in Healthcare and Social Welfare (159/2007). Express consent from the customer (data subject) is not required for the collection of information, but the disclosure of such information always requires separate consent from the data subject.

Furthermore, we also process personal data on the basis of our legitimate interest for compiling reports pertaining to our customers, for billing and statistical purposes.

6. Information held in the register

Our register contains information related to the treatment and service requirements of our customers. The register comprises entries made in the digital system and the documents related to these. The following data is collected for the register in a customer-specific manner:

- patient's name, national identification number and contact information
- name and telephone number of guardian(s) of an underaged patient
- name and telephone number of other guardians
- medical history and health records necessary for treatment of the patient
- treatment data
- research and procedure data as well as laboratory and medical imagery data
- statements and certificates
- information concerning the making of appointments and billing
- person making the entry and information about the reader, including updates

The processing of personal data and patient records adheres to the legal provisions of relevant acts, decrees and regulations.

- EU General Data Protection Regulation (2016/679)
- Data Protection Act (1050/2018)
- Ministry of Social Affairs and Health Decree on the Creation and Storage of Health Records (99/2001)
- Act on the Status and Rights of Patients (785/1992)
- Act on Digital Management of Patient Data in Social Services and Health Care Legislation (159/2007)

7. Disclosure of personal data

We process your personal data confidentially. The information contained by patient documents shall be confidential (Act on the Status and Rights of Patients 785/1992, section 13). Customer data shall only be disclosed within the limits defined by valid legislation and information about the disclosure of data shall be entered into the customer data. Customer medical records are only disclosed in the following cases:

- to the data subject itself, unless prohibited by law.
- to the guardian of a minor, unless the minor has refused such disclosure. If a minor patient because of his/her age or level of development can decide on the treatment given to him/her, he/she has a right to forbid providing his/her guardian or other legal representative with information on his state of health and care (Act on the Status and Rights of Patients 785/1992, section 9).

- to a third party using the written consent of the data subject, guardian of a minor or legal representative, or by legal disclosure stipulations (e.g. insurance companies and authorities, disclosure of information for statutory research).

No information from the system is disclosed outside the EU or EEA.

8. Data sources

Information is sourced and maintained on the basis of the information provided by the data subject and/or their legal representative or guardian of a minor.

Personal data can be acquired from authorities or other bodies, using either the written consent issued by the data subject or express legal provision. An entry is made in the patient's medical records concerning the acquiring of this information.

Sources of data are:

- the data subject themselves or guardian of a minor
- data acquired in connection with examinations and treatment
- consultation responses and statements
- results and statements from research entities
- documents available from other treatment facilities on the basis of consent provided by the patient or guardian of a minor.

9. Storing, archiving and disposal of information

Patient medical records are stored and archived in accordance with the stipulations of the Ministry of Social Affairs and Health Decree on Health Records (298/2009). The basic information about a patient and important treatment information shall be stored for a period of 12 years following the death of the patient, or in the absence of this information, 120 years following the birth of the patient.

Any possible personal data/health data on paper shall be stored in a locked facility that can only be accessed by authorised persons with the entitlement to access such information for conducting their occupational duties.

10. Protection of the register

Patient medical records are saved in the centralised patient register of Femeda on the basis of written consent issued by the patient in question. The data subject shall have the right to forbid or withdraw his or her consent for keeping data for joint usage at any time. In this case, the reading and marking entitlement for patient documents is held by the doctor seen on the visit in question, with the exception of data pertaining to making appointments, data used for billing purposes or the marking of information pertaining to examination responses.

Data stored in IT systems can only be viewed/processed by logging in to the Femeda network or DynamicHealth patient data system.

Access to computers, SaaS and medical record systems is achieved using personal login information. The controller's senior management shall issue access rights insofar as their work tasks require. The use of patient medical records is supervised by monitoring login data.

11. Data subject rights

Right to gain access to personal data

Customers have the right to check their own medical records free of charge. The written request to check their personal data shall be addressed to the practitioner who made the marking. This request can only be rejected in exceptional cases, if the data in question is regarded as causing serious risks to

the health or treatment of the customer or the rights of another person. All information shall be handed over to the customer in written form. You can request to check your information from here.

Right to demand the rectification, removal or restriction of data.

The customer is entitled to demand immediate correction of any erroneous or deficient information held in the patient register. This demand shall be issued in writing and delivered to the practitioner who made the entry or to the controller's contact person (Data Protection Officer).

The customer is also entitled to demand the controller to restrict the processing of their personal data, for example in a situation whereby the data subject is waiting for a response from Femeda regarding a request for the rectification or removal of personal data.

Furthermore, the customer is entitled to request the removal of their personal data, which will be implemented within the limits facilitated by legislation. In respect to information pertaining to the state of health, Femeda has a legal obligation to store information in line with the provisions of the Ministry of Social Affairs and Health Decree on the Creation and Storage of Health Records. You can request the rectification or removal of your personal data here.

Right for limiting processing

The customer is entitled to request the limitation of the processing of their personal data, if the customer claims the information is false. In this case, the processing of personal data is restricted for the time it takes to clarify the issue.

Rights for transfer of data from one system to another

The customer is entitled to request the transfer of information from one system to another, if the information has been provided by the data subject and the processing of personal data is based on consent or agreement. In respect to patient data, this right of transfer is not applicable.

Right to cancel consent

When the processing of personal data is based on consent, the customer is entitled to withdraw the consent it has issued at any time. Consent can be withdrawn by contacting the customer service staff of Femeda.

Right of appeal

In addition to the aforementioned rights and entitlements, you also have the right to appeal the use of your personal data by filing a claim with the supervisory authority.