

PRIVACY STATEMENT FOR PRIVATE CUSTOMERS

This privacy statement provides information in accordance with data protection legislation regarding the processing of personal data of private customers at Terveystalo.

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Controller

Suomen Terveystalo Oy (hereinafter referred to as "Terveystalo")
Jaakonkatu 3A, 00100 HELSINKI, Finland

Suomen Terveystalo Oy shares its patient register with Terveystalo and the healthcare professionals who provide services at Terveystalo as self-employed professionals or as service providers through external companies.

Purposes of and legal basis for the processing of personal data

Personal data is processed for the following purposes and on the following legal basis:

- The provision of healthcare services on the basis of the law
- The provision of occupational health services on the basis of the law or customer's consent
- The assessment of a need for work ability and well-being services as well as for the purpose of targeting and providing services on the basis of an agreement between the customer and Terveystalo, the law or Terveystalo's legitimate interest
- The supervision of healthcare professionals' operations and the quality of their work on the basis of the law
- Marketing and/or communications on the basis of the customer's consent, an agreement or Terveystalo's legitimate interest
- The planning, development, management, monitoring and reporting of Terveystalo's own operations and services as well as for quality assurance and knowledge management on the basis of the law or Terveystalo's legitimate interest
- Research and the compiling of statistics on the basis of consent, the law, public interest or Terveystalo's legitimate interest
- The handling of customer contacts, feedback, clarification requests from authorities, and incidents on the basis of the law and Terveystalo's legitimate interest
- The provision of digital services targeted at logged in customers on the basis of the law, an agreement between the customer and Terveystalo or the customer's consent
- Invoicing, payment collection on the basis of the law or an agreement between the customer and Terveystalo
- Investigation and fixing of an error in a digital service (e.g. online service, application) on the basis of Terveystalo's legitimate interest
- Monitoring of user's online behaviour and use of digital services on the basis of Terveystalo's legitimate interest or the customer's consent

- Ensuring legal protection of Terveystalo and the customer as well as meeting statutory or other obligations based on regulations and guidelines issued by authorities, the verification of abuses and usage monitoring on the basis of law or legitimate interest

Additional information: [Consents](#)

The purposes of the processing

Personal data is processed for the provision of healthcare services

- For the planning, implementation and monitoring of a patient's examinations and care
- For the management of appointments
- Invoicing for the services
- As part of the implementation of healthcare services, we analyze the health data collected in connection with a patient's use and Terveystalo's provision of healthcare services in an automated manner for healthcare purposes, such as promotion of health (profiling)

Personal data is processed for the provision of occupational healthcare services

- For the planning, implementation and monitoring of occupational healthcare patients' examinations and care
- For the assessment of work ability
- For the implementation of an action plan
- For the management of appointments; if the occupational health service includes an appointment booking on the basis of profiling, such profiling is conducted only on the basis of the patient's consent
- For service invoicing and statutory and/or group-level reporting to customer organizations
- As part of the implementation of healthcare services, we analyze the health data born in connection with a patient's healthcare service use and implementation in an automated manner for healthcare purposes, such as assessing employees' need for support in terms of work ability and for the promotion of employees' health (profiling)

Personal data is processed for the provision of work ability and well-being services

- For the provision of work ability coaching
- For the provision of well-being services

Personal data is processed to ensure the quality of healthcare professionals' operations and work

- For ensuring appropriateness of the processing of patient information and other personal data

Personal data is processed for marketing and communication purposes

- For taking care of customer relationships, for example, reminding customers of appointments and of the need to renew prescriptions and vaccinations
- For communicating clinical studies at the patient's consent
- For the collection, monitoring, and analyzing of information concerning customer interests and choices and wishes related to services and clinics, and developing the related customer services
- For the registration and marketing of activities and benefits pursuant to the loyalty program
- For the consideration of customer wishes and the targeting of services
- For the communication and marketing of products and services
- For the targeting of communication, marketing and services
- For the implementation of market research and surveys

- For analyzing, profiling, segmenting and drafting statistics for the aforementioned purposes

Personal data is processed for the handling of customer contacts, feedback, clarification requests from the authorities, and incidents

- For the processing of customer contacts and feedback
- For the handling of notifications and complaints pursuant to the Patients Act
- For the processing of other official requests for clarification
- For the processing of incident reports
- Communication between customers and the customer service center (such as telephone conversations) are recorded to verify service events and ensure the quality of the service, for development purposes as well as to ensure the legal protection of the parties involved

Personal data is processed for the provision of digital services targeted at logged in customers (e.g. Terveystalo application, online services for logged in customers)

- For the management of the contact information and consent of a user registered for the service and for reviewing health information
- For the management of appointments
- For the use of remote services
- For communication and exchange of information between Terveystalo and the customer
- For making payments related to transactions
- For the offering and marketing of services provided by the controller or its partners
- For sending reminders and recommendations related to health in the service
- For monitoring, analyzing, and profiling information on registered users' interests as well as their choices and wishes related to services and clinics, and for developing the related customer services

The categories of personal data processed

We process the following personal data:

- Basic information
- Health information
- Information related to work ability
- Information related to well-being
- Gene test data
- Employer information
- Appointment information
- Information and recordings of customer service events
- Invoicing and payment information
- Information of the digital services for logged in customers (e.g. Terveystalo application, online services for logged in customers)
- Information of customer contacts, feedback, clarification requests from the authorities, and incidents
- Other information related to the service
- Data related to the use of identification and authentication devices and services
- Data related to the use of our website and digital services, online behavior and analytics
- Consents and refusals

The categories of personal data processed

Basic information

Name, personal identity code, contact details, mother language and language of service, occupation, other identification information (e.g. copy of a passport, where necessary), next of kin specified by the patient/in case of underaged patients, guardians and their contact details

Health information

- Health information required by healthcare professionals for treating the patient (patient records, photographs, referrals, statements and forms)
- Health and self-care data provided by the patient (e.g. preliminary data concerning medical history, questionnaire responses)
- Information on laboratory tests, imaging studies, and other examinations.
- Information related to physiotherapy and occupational physiotherapy as well as information related to the employer (such as workplace visits)

Information related to work ability

- Information related to assessment of work ability
- The customer data used in the work ability coaching services

Information related to well-being

- Information related to well-being, such as replies to questionnaires, follow-up data and analyses
- Measurement data produced or submitted by the customers themselves
- Information about use of well-being services

Gene test data

- Samples and test results

Employer information

- Information pertaining to the employer of occupational healthcare customers, such as department or unit, job title, superior-subordinate, sickness fund membership, the employer's insurance company details

Appointment information

- Customer, date, time, place and the person for whom the appointment was made as well as the person who made the appointment and date on which it was made
- Appointment history

Information and recordings of customer service events

- Communications between Terveystalo and the customer
- Telephone number of the caller, identifier of the recipient, date and hour, and the recording of the conversation
- Chat session recordings
- Parties to the chat, date and hour, and the recording of the chat

Invoicing and payment information

- Invoicing information concerning treatment and other services. Payer information related to the treatment or care (for example insurance company)
- Order, payment and payer information related to the online store

Information of the digital services for logged in customers (e.g. Terveystalo-application, online services for logged in customers)

- Information on health as well as any mobility limitations, injuries, illnesses, or other health problems provided by the user
- Vaccination information
- Information on hobbies and other interests
- Information related to the use of a heart rate monitor or activity tracker
- Other information entered by the user in relation to the user's health and fitness
- Payment related information
- Communication between Terveystalo and the customer
- Information required for arranging remote care such as voice or video or photos possibly sent by the user
- Location data of the user's end device (where the user has consented to the use of location data) for purposes of offering appointments in clinics located close to the user
- Information related to use of identification and authentication devices and services
- User log and measures taken by the user in digital services

The handling of customer contacts, feedback, clarification requests from the authorities, and incidents

- Customer contact, feedback or clarification requests and the replies to them
- Contact information given by the customer or the feedback provider
- Incident description and the report given to the person concerned.

Other information related to the service

- Name and title of the person who made the note on the patient record as well as data and time on which it was made
- Information on satisfaction in services and comments on the controller's services
- Information related to wishes, choices, and services that the user would like to have
- Market research and questionnaire responses
- Contact history
- Information recorded from a third party register with the user's express consent
- Loyal customer information

Data related to use of website and digital services, online behavior and analytics

- IP address and information concerning the user's network connection
- Information on the user's end device, browser and operating system
- Session ID, timestamp and other corresponding information
- Information on the use of applications and services (e.g. log data, data collected by using cookies and other corresponding monitoring technologies, web analytics)
- Website behavior during the session

Consents and refusals

- A person's consent and refusal information related to direct marketing and the processing of personal data

Storage periods of personal data

Terveystalo only stores personal data that are necessary for Terveystalo's operation and for the purposes the personal data in question are processed. Terveystalo only stores personal data if it has a legal basis for its processing. Storage period of personal data is determined on the basis of the purpose the personal data in question are processed and/or the personal data in question. Storage period is affected by legal obligations concerning storing of personal data as well as other time limits for different actions (e.g. a period of filing a suit, expiration of time limit for the right to institute criminal proceedings).

- In accordance with the Decree of the Ministry of Social Affairs and Health on Patient Records, patient data, i.e. information related to a patient's medical care must in general be stored for a period of 12 years after the patient's death or, if there is no information about the patient's death, for 120 years after the patient's date of birth.
- Recordings of customer service events are in general stored for a period of six months.

Terveystalo erases personal data that are no longer necessary for the purposes they were processed even during the customer relationship. Such personal data may relate to e.g. marketing and the use of online services. Personal data are anonymised or securely destroyed when they are no longer necessary for the purposes they were processed, when they are outdated or where there is otherwise no basis for their continued processing.

Data sources

The personal data to be processed is primarily collected from the customer themselves, the patient's guardian or other legal representative. Personal data is also collected from the medical staff in connection with examination and treatment.

As regards patient data, another healthcare provider may view the patient's information via the Kanta service in accordance with the customer's disclosure permissions (consents) and refusals. The disclosure permissions (consents) and refusals in question can be updated through the MyKanta service (<https://www.kanta.fi/en/citizens>).

The basic information of the customer may be updated from the Digital and Population Data Services Agency's Population Information System.

In terms of occupational healthcare, a patient's basic information, the workplace's contact information and any changes to the aforementioned are collected from the employer as per the occupational healthcare agreement.

Personal data is also obtained from third party healthcare units or healthcare professionals with the patient's consent or on the basis of the law.

In some situations, data is also received from insurance companies or pension insurance companies.

Processing and disclosure of personal data

Terveystalo's healthcare professionals and specialists process personal data on the basis of joint register consent. In terms of occupational healthcare services, personal data is processed by the professionals involved in the occupational healthcare.

The processing of personal data is outsourced to Group companies and/or external service providers who process the personal data on behalf of Terveystalo. Personal data may be transferred outside the EU or the EEA within the confines of legislation. In such cases, the transfer takes place in accordance with the European Commission's standard contractual clauses or some other transfer mechanism permitted by data protection legislation. However, e.g. the patient information systems used by Terveystalo are located in the EU/EEA.

Personal data are also in some cases disclosed to services providers who act as independent controllers, such as payment, financing or collection service providers (e.g. Walley, MobilePay, Smartum Pay, Santander Consumer Finance, RopoCapital) as well as delivery and courier service providers.

Personal data is disclosed to the following parties on the basis of the law or customer's consent:

Kela's Prescription Centre

- Electronic prescriptions are saved in the Social Insurance Institution of Finland's (Kela) Prescription Centre, the joint controllers of which are Kela, pharmacies and service providers and independent professionals who prescribe e-prescriptions. By law, Kela acts as the contact point for data subjects as regards the Prescription Centre. Additional information is available at www.kanta.fi/en/citizens.

Kanta Patient Data Repository

- Information concerning healthcare and laboratory test results are saved by law in the national Kanta Patient Data Repository. Kela produces summaries of said data that can be used by healthcare providers through the Information Management Service for purposes of the patient's treatment. Kela and healthcare providers jointly act as the controllers of the Information Management Service. By law, Kela acts as the contact point for data subjects as regards the Information Management Service. The customer can view the summaries in MyKanta-service (<https://www.kanta.fi/en/my-kanta-pages>). Additional information is available at <https://www.kanta.fi/en/privacy-policies>.

Third party healthcare unit/organization/treatment facility or healthcare professional

- Information required for the arrangement and provision of medical care may be disclosed to another healthcare provider in accordance with a patient's oral or written consent or other approval otherwise apparent by the context and recorded in the patient record.
- Information required for the arrangement or provision of medical care can be disclosed to a healthcare provider if the patient is not capable of assessing the significance of the consent due to a mental health disturbance, handicap or other comparable reason and the patient does not have a legal representative, or in case consent cannot be obtained due to the patient's unconsciousness or other comparable reason.

Kela

- In case the customer requests Terveystalo to apply for Kela-reimbursement on the customer's behalf, information on reimbursable measures taken during appointment and referrals that are necessary for purposes of payment of the healthcare service are disclosed to the Social Insurance Institute of Finland (Kela).

Insurance companies

- Data necessary in respect of statutory insurance is disclosed to insurance companies on the basis of the law, without consent.
- Data necessary in respect of voluntary insurance is disclosed on the basis of the patient's consent.

Employers

- When the patient is an occupational healthcare patient, data can be disclosed on the basis of the patient's separate and explicit consent, e.g. where the employer uses the electronic transmission service for A certificates to the work ability control system provided by Terveystalo.

Authorities and entities

- Data is disclosed to authorities and entities with a right to information pursuant to the law on the basis of a written and specified request and in the format and scope required by the matter, or on the basis of the customer's consent.

Patient's next of kin

- In the event that the patient is unconscious or under medical care for some equivalent reason, data can be disclosed to next of kin or to another person close to them, unless there is reason to believe that the patient has prohibited the disclosure of the data.

Research organizations

- Data included in patient records can be disclosed to research organizations in accordance with the law on the basis of the customer's consent.

In the event of a patient's death, the secrecy obligation and need for privacy protection remains in force, meaning that data cannot be disclosed without a legal basis.

Based on the Communicable Diseases Act, any information needed to detect an epidemic, identify the cause and trace-back can be submitted to the Finnish Institute for Health and Welfare and the wellbeing services county/HUS Group.

Data subjects' rights

Right of access

- Data subjects have the right to know whether personal data concerning them are being processed and to access data concerning themselves.
- The data subject can access and review their information in digital services targeted at logged in customers (e.g. Terveystalo application and online service for logged in customers) and through the MyKanta service (<https://www.kanta.fi/en/my-kanta-pages>). In addition, the data subject can make a request for inspection of his or her personal data.

Right to rectification

- Data subjects have the right to request the rectification of erroneous or incomplete data.

Right to erasure

- Data subjects have the right to request the erasure of their personal data. Requests for erasure are implemented within the confines permitted by the law. In respect of information concerning a data subject's health, Terveystalo has a legal obligation to store the data pursuant to the Decree of the Ministry of Social Affairs and Health on Patient Records.

Right to object or restrict processing

- The data subject has, in certain situations, the right to object to the processing of their personal data on grounds related to their particular situation at any time.
- A data subject has the right to request the restriction of the processing of their personal data if the data subject contests the accuracy of their personal data. In such cases, the processing of the personal data is restricted for the duration of the investigation.

Right to data portability

- A data subject has the right to request that their data be transmitted from one system to another if the data has been provided by the data subject themselves and if the processing of the personal data is based on consent or an agreement. The right to data portability does not apply to patient information.

Right not to be subject to an automated decision-making

- The data subject has the right not to be subject to a decision based solely on automated processing, such as profiling, which produces legal effects concerning them or similarly significantly affects them. However, there are exceptions to this prohibition.

Withdrawal of consent

- Where the processing of personal data is based on consent, the data subject can withdraw their consent at any time. The consent can be withdrawn in accordance with the instructions given in the service that is based on consent or by contacting Terveystalo's customer service.

Right to lodge a complaint with a supervisory authority

- A data subject has the right to lodge a complaint with the supervisory authority (Data Protection Ombudsman in Finland) if the data subject is of the opinion that the processing of personal data has infringed data protection legislation. Instructions for lodging a complaint can be found on the Data Protection Ombudsman's website: www.tietosuoja.fi/en.

Requests pertaining to the rights of data subjects must primarily be made in writing at a clinic or in the digital service targeted for logged in customers (more information is available in Finnish at <https://www.terveystalo.com/fi/asiakkaalle/potilastietoihin-liittyvat-pyyntot>). The data subject's identity is verified in a reliable way when the request is submitted. At the Terveystalo clinics the data subject's identity is verified from an official identification document. In the digital services identity is verified when the data subject logs in using Finnish online banking codes or a mobile certificate. These procedures ensure confidentiality and appropriate processing of personal data.

Protection of personal data

Terveystalo applies the appropriate physical, technical, and administrative protection measures to protect data from misuse. These measures include, among others, control and filtering of network traffic, use of encryption techniques and safe data centers, appropriate locking systems and access control, controlled granting of access rights and supervision of their use, giving instructions to staff participating

in personal data processing and risk management related to the planning, implementation, and maintenance of our services. Terveystalo chooses its subcontractors carefully and uses agreements and other arrangements to ensure that they process data in compliance with the law and good data protection practices.

Contact information

DATA PROTECTION OFFICER

email tietosuoja@terveystalo.com

Terveystalo's Data Protection Officer
Suomen Terveystalo Oy
Jaakonkatu 3A, 00100 HELSINKI, FINLAND

PATIENT OMBUDSMAN

email potilasasiamies@terveystalo.com

Additional information is available at:

<https://www.terveystalo.com/en/customer/patient-ombudsman/>

Please note that in order to secure your privacy, ordinary, unencrypted email must not be used to send sensitive personal data or health information (e.g. personal identity code or other confidential information).

The original Privacy Statement is in Finnish. In the case of discrepancy between English and Finnish versions the Finnish version shall prevail.