

**INFORMATION DOCUMENT AND  
RECORD OF PROCESSING ACTIVITIES**

Drafted on: 19 October 2006  
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EU General Data Protection Regulation (679/2016)

1. Data controller	<b>Aava Medical Centre Ltd</b>
2. Person in charge of the data file and contact persons	<p>Aava Medical Centre, Occupational Healthcare Services          Timo Vänttinen, Chief Physician, occupational health care          Annankatu 32, FI-00100 Helsinki, Finland          tel. +358 (0)10 380 3800          (firstname.lastname@aava.fi)</p> <p>Service managers in each unit act as respective contact persons:          (tel. +358 (0)10 380 3800 or firstname.lastname@aava.fi)</p> <p>Occupational health care clinic Aava Alikerava, Hanna Lempinen          Occupational health care clinic Aava Jorvas, Sanna Liuhto          Occupational health care clinic Aava Järvenpää, Hanna Lempinen          Karaportti occupational health care clinic, Niina Honkamaa          Rusko occupational health care clinic, Mira Näyhä          Aava Medical Centre Aviapolis, Nina Turunen          Aava Medical Centre Hyvinkään Pipetti, Jaana Kiema          Aava Medical Centre Itäkeskus, Jaana Kiema          Aava Medical Centre Järvenpää, Hanna Lempinen          Aava Medical Centre Kamppi, Anu Svensk          Aava Medical Centre Kerava, Jaana Lehto          Aava Medical Centre Keravan Terveyspuisto, Saila Kautonen          Aava Medical Centre Pasila, Jaana Kiema          Aava Medical Centre Tampere, Marianne Vuorenmaa          Aava Medical Centre Tapiola, Sanna Liuhto          Aava Medical Centre Tuusula, Hanna Lempinen          Aava Medical Centre Turku, Sanna Kurppa (Occupational Health Nurse in charge)</p>
3. Data protection officer	<p>Ida-Emilia Laasonen          Annankatu 32, FI-00100 Helsinki, Finland          tel. +358 (0)10 380 3800          dpo@aava.fi</p>
4. Name of the data file	<b>Patient register of Aava Medical Centre, Occupational Healthcare Services</b> (Centralised patient register of the occupational healthcare services of Aava Medical Centre)
5. Purpose of the processing of personal data and purpose of the data file	<p>The principal purpose of the data file is to promote the prevention of work-related illnesses and accidents, the safety of the work and the work environment as well as the health, work ability and functional capacity of the employees of our customer organisations who have made an occupational health care contract with us. The data file is used to plan, implement and monitor the examination and treatment of employees'/patients' health, illnesses and injuries and to process any related data.</p> <p>The data file is also used for providing other services specified in the Occupational Health Care Act and for reporting about them to the customer organisation. Reporting to customer organisations takes place at the level of work communities. Sensitive information concerning an</p>

	<p>individual employee will not be reported to the customer organisation.</p> <p>The register is also used for invoicing and collection purposes. Furthermore, the register is used for planning, developing, compiling statistics and following up of the data controller's own operations as well as for tasks related to the implementation of the rights and obligations of the data controller.</p> <p>Allowing the person's information to be stored in the patient register is a prerequisite for forming a treatment relationship with Aava Medical Centre. The processing of personal data is based on Aava Medical Centre's legal obligations to process patient data, a legitimate interest based on the patient relationship or the patient's consent or another relevant connection.</p> <p>The patient register ensures the monitoring of health care professionals and compliance with rules and regulations on private healthcare.</p> <p>Legislation governing the maintenance of the register:          Act on the Medical Use of Human Organs and Tissues (101/2001)          Act on the Status and Rights of Patients (785/1992)          Act on the Electronic Processing of Client Data in Social and Health Care (159/2007)          Act on Health Care Professionals (559/1994)          Act on National Person Data Files in Health Care (556/1989)          Act on Private Health Care Services (152/1990)          Archives Act (831/1994)          Decree of the Ministry of Social Affairs and Health on Health Records (298/2009)          Decree on National Person Data Files in Health Care (774/1989)          Decree on Private Health Care Services (744/1990)          Employment Accidents Insurance Act (608/1948)          Health Insurance Act (1224/2004)          Motor Liability Insurance Act (279/1956)          National Pensions Act (347/1956)          The Data Protection Act (1050/2018)          The EU general data protection regulation (679/2016)          Employment Accidents Insurance Act (608/1948)          Occupational Health Care Act (1383/2001)</p>
<p>6. Content of the data file</p>	<p>Basic information in the patient register:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• personal identity code</li> <li>• contact information (such as address, telephone, email address)</li> <li>• profession</li> <li>• the guardian of an underage patient / a family member or another person close to the patient and their contact information and, if necessary, their personal identity code</li> </ul> <p>Patient's consent to the processing and disclosure of data.</p> <p>Statutory patient records, including details of examinations and treatment provided</p> <ul style="list-style-type: none"> <li>• documents related to occupational health check-ups and documents related to informing and guiding as specified in the Occupational Health Care Act</li> <li>• health, illnesses and injuries; planning, implementing and monitoring</li> </ul>

	<p>examinations and treatment; any related information</p> <ul style="list-style-type: none"> <li>• vaccinations</li> <li>• laboratory and radiology examination data</li> <li>• results of examinations performed in the central laboratory</li> <li>• medical statements</li> <li>• any necessary data requested from other units</li> <li>• referrals to other units</li> <li>• information recorded by a Psychologist or an Occupational Psychologist</li> <li>• information concerning physiotherapy and occupational physiotherapy as well as information related to the employer (e.g. workplace visits)</li> <li>• any other relevant information.</li> </ul> <p>Name and title of the person who made the entry and date of entry.</p>
<p>7. Regular sources of data</p>	<p>The employer with whom Aava Medical Centre has made an occupational health care contract will provide the basic information related to the employment relationship (name, personal identity code, home address, telephone number and work e-mail address).</p> <p>The personal data stored in the patient register has been provided by the patient themselves or by the guardian of an underage patient. The correctness of personal data and contact details is verified at each appointment.</p> <p>Data, reports and statements related to examinations and treatment.</p> <p>Consultation results</p> <p>Documents obtained from other treatment or rehabilitation units with the permission of the patient/customer.</p> <p>Information provided via the online service.</p>
<p>8. Regular disclosure of data</p>	<p>Patient information is confidential, and those processing it are bound by an obligation of secrecy.</p> <p>Patient information may be disclosed primarily based on the patient's written consent. If the patient is not capable of assessing the significance of the consent, information may be given by his/her legal representative's written consent.</p> <p>In the case of further treatment, information necessary for the arranging of examination and treatment of the patient may be given to another health care unit or health care professional, and a summary of the treatment provided may be given to the health care unit or the health care professional that referred the patient for treatment and to a physician possibly appointed to be responsible for the care of the patient in accordance with the patient's orally-given consent or consent that is otherwise obvious from the context.</p> <p>Information necessary for arranging and providing the examination and care of a patient may be given to another Finnish or foreign health care unit or health care professional, if the patient, owing to mental health disturbance, mental handicap or for comparable reason is not capable of assessing the significance of the consent and he/she has no legal representative, or if the patient cannot give the consent because of unconsciousness or for comparable reason.</p>

	<p>Information about the identity and state of health of a patient may be given to a family member of the patient or to other person close to the patient, if the patient is receiving treatment because of unconsciousness or for other comparable reason, unless there is reason to believe that the patient would forbid this.</p> <p>Information in the patient register (including patient documents) is disclosed to authorities, such as the Parliamentary Ombudsman, The National Supervisory Authority for Welfare and Health, Regional State Administrative Agencies as well as insurance institutions, based on the special provisions set forth in the legislation. The aforementioned organisations process the confidential data disclosed to them in order to carry out their statutory duties and only for the purposes specified by law.</p> <p>In order to review the validity of a driving licence, the licence to carry firearms or other similar licence, the police have the right to obtain, upon a justified request, data related to a licence holder's health, substance use or violent behaviour regardless of any secrecy obligation, if there is a reason to suspect that the licence holder no longer meets the conditions of the licence.</p> <p>In addition, information in the patient register may be disclosed, regardless of any secrecy obligation, to authorities maintaining national registers, such as the cancer and infectious disease registers maintained by the National Institute for Health and Welfare and the Adverse Reaction Register maintained by the Finnish Medicines Agency Fimea.</p> <p><b>According to chapter 4, section 18 of the Occupational Health Care Act:</b> Information designated confidential by law may not be disclosed without the consent of the party for whose benefit the confidentiality obligation is prescribed, as separately provided. Notwithstanding what is provided on the confidentiality of patient records in the Act on the Status and Rights of Patients, an occupational health physician in the service of the occupational health care service provider may supply:</p> <ol style="list-style-type: none"><li>1) the employer, in the case of work with a special risk of illness, with a written statement on the conclusions of medical examinations and the appropriate occupational safety and health action on the basis of these, to the extent that they concern occupational safety and health and occupational health care;</li><li>2) the statement referred to in subparagraph 1 above to the occupational safety and health authority and the expert referred to in section 12 of the Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces for the purposes of monitoring occupational safety and health; <u>(51/2006)</u> and</li><li>3) an occupational health care service provider on request for the purposes of monitoring health risks, with information on the medical examinations of an employee who has been a patient and been engaged in work causing a special risk of illness and who has transferred to work which is similarly dangerous in the service of an employer whose occupational health care is the responsibility of the occupational health care service provider requesting the information.</li></ol> <p>The data is disclosed as paper print-outs of electronic patient documents</p>
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	and copies of manual documents.
9. Transfer of data outside the EU or the European Economic Area	The data in the data file will primarily not be disclosed outside the European Union or the European Economic Area. The personal data of the data subject may be transferred outside the EU or EEA only with the data subject's specific consent or in exceptional cases to protect the vital interests of the data subject.
10. Storage, filing and disposal	<p>The storing of patient documents and other material related to the treatment of the patient is the responsibility of the health care unit or private health care professional whose operations have generated the data in question.</p> <p>Patient information is stored in accordance with the Decree of the Ministry of Social Affairs and Health on Patient Documents (298/2009). Patient documents such as the documents containing the patient's basic information and essential treatment information, documents containing a statement of the patient's wishes, summaries, entries related to the planning, implementation, monitoring and assessment of treatment and the documents formed from those entries as well as referral, treatment feedback and consultation documents are kept for 12 years after the death of the patient, or if there is no information about the patient's death, for 120 years after the birth of the patient.</p> <p>The occupational health care team's examination and calculation materials as well as data collection forms such as individual documents related to the maintenance of employees' work ability (work ability index forms, work-related stress questionnaires and work ability profiles): for 12 years after the creation of the document.</p> <p>Documents concerning persons who have been examined or treated for occupational diseases: for 20 years after the patient's death, or if there is no information about the patient's death, for 100 years after the patient's birth and for 10 years after the end of the treatment.</p> <p>Detailed information regarding the storage periods of different kinds of documents can be found in the <u>appendix</u> of the Decree of the Ministry of Social Affairs and Health on Patient Documents (298/2009).</p> <p>Patient information will be filed in the national filing service (eResepti and eArkisto) maintained by the Social Insurance Institution of Finland in accordance with the Act on the Electronic Processing of Client Data in Healthcare and Social Welfare (159/2007) and the Act on Electronic Prescriptions (61/2007).</p> <p>When patient records are disposed of, it shall be ensured that outsiders cannot access the data.</p>
11. General description of technical and organisational security measures	<p>The data controller has taken appropriate technical and organisational measures to protect the data.</p> <p>Patient data may only be accessed by healthcare professionals involved in the patient's treatment at a given time and their assistants. Data may only be accessed to the extent required by the tasks of the healthcare professional.</p> <p>Manual documentation shall be stored in lockable archives, and only the</p>

	<p>persons who have the right to access them on the basis of confidentiality rules may access the documentation.</p> <p>Electronically stored data is protected through electronic access rights. Software applications and workstations require personal user credentials. The user name or password must not be disclosed to anyone. Usage of data systems and the access to the data in them is monitored separately for each username.</p> <p>Training and instructions were provided to employees when the software was deployed. IT support and main users were trained more extensively. New employees are trained and receive instructions as part of their job orientation. All employees sign a non-disclosure agreement at the time of signing their employment contract.</p>
<p>12. Right of access</p>	<p>Regardless of secrecy provisions, patients/customers shall have the right of access to the data on them in a personal data file.</p> <p>The right of underage persons to obtain information on themselves is determined according to general provisions on the right to be heard. Underage persons who are under 15 years of age but, in the view of their age and maturity, are capable of making decisions on their treatment, may exercise the right of access independently. If an underage person who is capable of making decisions on treatment forbids the disclosure of the data to a parent or guardian, the latter shall have no right of access to patient register data.</p> <p>The right of access may be denied only in exceptional cases. Valid reasons for denying the access include that providing the information would cause serious danger to the patient's health or treatment or to the rights of someone else.</p> <p>The request to access patient data shall be made when visiting a clinic in person or by submitting a document that carries the person's own signature or is otherwise reliably verified. The identity of the persons exercising their access right shall be verified. Forms for requesting the right to access the patient register are available at the receptions of Aava Medical Centres and on the website.</p> <p>Patients/customers have the right to access their own patient records and obtain their information in writing on request. The access shall be provided without unnecessary delay, and the data shall be provided in a legible form. If necessary, a healthcare professional may explain the data.</p>
<p>13. Rectifications and their implementation</p>	<p>Aava Medical Centre, on its own initiative or at the request of the patient, without undue delay rectify, erase or supplement any data contained in the patient register if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing.</p> <p>The request for rectification of patient data shall be made when visiting a clinic in person or by submitting a document that carries the person's own signature or is otherwise reliably verified. The patient's identity is verified before the request is processed. Forms for requesting rectification of data are available at the receptions of Aava Medical Centres and on the website.</p> <p>A health care professional will, together with a Senior Physician, assess whether there is cause for the rectification, erasure or supplementation of</p>

	<p>data.</p> <p>If the request for rectification is justified, the patient will be notified of the rectification of data recorded in the patient documents. If there are no grounds for rectification, a certificate of refusal, explaining why the request was refused, shall be provided.</p>
14. Right to erasure (“right to be forgotten”)	<p>The patient has, under certain conditions, the right to have their data erased, also known as the right to be forgotten. The patient has the right to withdraw consent for the processing of their data and, after that, the right to submit a written request for the erasure of their data to Aava Medical Centre, insofar as the data is not processed in order to fulfil a legal obligation.</p> <p>The withdrawal of consent for the processing of personal data and the request for the erasure of personal data shall be made when visiting a clinic in person or by submitting a document that carries the person’s own signature or is otherwise reliably verified. The identity of the person submitting the request shall be verified.</p>
15. Right to restrict processing	<p>The patient has the right to request Aava Medical Centre to restrict the processing of their personal data in situations such as when the patient is waiting for the data controller’s response to their request for the rectification or erasure of their data.</p> <p>The request shall be made when visiting a clinic in person or by submitting a document that carries the person’s own signature or is otherwise reliably verified. The identity of the person submitting the request shall be verified.</p>
16. Right to data portability	<p>The patient has the right to receive their data from the controller in a machine-readable format and to transmit the data to another controller. However, this requires that the patient themselves has provided the data in question to Aava Medical Centre.</p> <p>The request shall be made when visiting a clinic in person or by submitting a document that carries the person’s own signature or is otherwise reliably verified. The identity of the person submitting the request shall be verified.</p>
17. Right to lodge a complaint with a supervisory authority	<p>The patient has a right to lodge a complaint with a supervisory authority if he/she considers that the processing of the personal data related to him/her infringes the General Data Protection Regulation.</p>
18. Register administration	<p>This information document and record of processing activities has last been updated on 7 August 2018.</p> <p>The data controller keeps track of the changes in the legislation and instructions by the authorities concerning data protection and develops the operations of the service. This requires the data controller to reserve the right to update this record.</p>