

**INFORMATION DOCUMENT AND  
RECORD OF PROCESSING ACTIVITIES**

Drafted on: 25 May 2018  
Updated on: 22 January 2019

EU General Data Protection Regulation (679/2016)

1. Data controller	<b>Aava Medical Centre</b>
2. Person in charge of the data file	Aava Medical Centre Nina Lyly, Regional Manager Annankatu 32, FI-00100 Helsinki, Finland tel. +358 (0)10 380 3800
3. Data protection officer	Ida-Emilia Laasonen Annankatu 32, FI-00100 Helsinki, Finland tel. +358 (0)10 380 3800 dpo@aava.fi
4. Name of the data file	<b>Record of processing activities related to Aava Medical Centre's (Lääkärikeskus Aava Oy) customer feedback register.</b>
5. Purpose of the processing of personal data and purpose of the data file	<p>The customer feedback register is used to store feedback provided by customers to Aava Medical Centre. Customer feedback is deemed to include any feedback given by a customer in verbal, written or other form, such as a smiley.</p> <p>The personal data collected in the customer feedback system is intended for handling and responding to feedback.</p> <p>Feedback can also be provided anonymously. Aava Medical Centre will not respond to anonymously submitted feedback, but the feedback will be processed and archived in the feedback system.</p> <p>The grounds for the processing of personal data is based on a legitimate interest in accordance with the EU General Data Protection Regulation (GDPR).</p>
6. Content of the data file	<p>Content of the data file :</p> <ul style="list-style-type: none"> <li>- content of feedback forms saved in the customer feedback system</li> <li>- any personal and contact information of the feedback providers</li> <li>- data on the users who have logged into the feedback system</li> </ul> <p>The content of the customer feedback is used for compiling statistics and summary data. The feedback is also used to develop customer service and other Aava Medical Centre operations.</p>
7. Regular sources of data	<p>Data provided by</p> <ul style="list-style-type: none"> <li>- the customer.</li> <li>- from another person who recorded the feedback</li> <li>- responses to feedback saved by the users</li> </ul>

8. Regular disclosure of data	<p>Aava Medical Centre processes personal data as a data controller itself, but also employs the help of its system service provider. Aava Medical Centre uses reliable partners and is responsible for the actions of the selected service providers in processing personal data.</p> <p>In order to address customer feedback, personal data may be disclosed within Aava Medical Centre to its professionals.</p>
9. Transfer of data outside the EU or the European Economic Area	The data in the data file will not be disclosed outside the European Union or the European Economic Area.
10. Storage, filing and disposal	The retention of personal data is required for contacts and for handling the feedback. Personal data in the customer feedback register will be anonymised after six (6) months from the date that the feedback was submitted.
11. General description of technical and organisational security measures	<p>Aava Medical Centre protects the entire lifecycle of the personal data using appropriate safeguards. Personal data is protected, for example, by predictive risk management, electronic safeguards, user management and security systems.</p> <p>Training and instructions were provided to employees when the software was deployed. 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. The non-disclosure agreement remains valid after the termination of the employment relationship.</p> <p>Software applications and workstations require personal user credentials. Usage of data systems and the access to the data in them is monitored separately for each username.</p>
12. Rights of the data subject	<p>The rights of the data subject are governed by the EU General Data Protection Regulation, including:</p> <p><b>Right to gain access to the data</b> Data subjects have the right to access their personal data. Aava Medical Centre will inform the data subject whether or not it processes personal data concerning the data subject and will provide a copy of any processed personal data.</p> <p><b>Right to rectification</b> The data subject has the right to request that Aava Medical Centre as the data controller rectifies any inaccurate or incorrect personal data concerning them.</p> <p><b>Right to erasure</b> The data subject has the right to submit a written request to Aava Medical Centre to erase any personal data concerning them from the register. The data will be erased if there are no longer any legal grounds for processing.</p> <p><b>Right to lodge a complaint with a supervisory authority</b> The data subject has the right to lodge a complaint with a supervisory authority if they consider that the processing of their personal data infringes the General Data Protection Regulation. The supervisory authority is the Office of the Data Protection Ombudsman (Ratapihantie</p>

	<p>9, 00520 Helsinki or tietosuoja(at)om.fi).</p> <p><b>Right to cancel consent</b>          If Aava Medical Centre processes the data subject's personal data based on consent, the data subject has the right to cancel their consent.</p> <p><b>How can you exercise your rights?</b>          You can send a personally signed request to our data officer (contact information in section 3).</p>
13. Register administration	<p>This information document and record of processing activities has last been updated on 22 January 2019. 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>