

Data Privacy Policy Työplus Yhtiöt Oy

European Union's General Data Protection Regulation (EU 679/2016)

1. Data Controller

Työplus Yhtiöt Oy, Business ID 2661818-3
Mariankatu 26, 67200 Kokkola, Finland

2. Contact persons for registry issues

Data Protection Officer and contact info

Kaisa Myllymäki

Phone: 040 806 8165

Email: kaisa.myllymaki@tyoplus.fi

Data Protection Officer

Outi Paloneva, Leading Doctor

3. Name of Registry

Työplus Yhtiöt Oy's Customer data registry Patient Data System Acute TT2000.

4. Purpose of handling personal data

Personal data is used in client / patient relationships for preventive health services based on the Occupational Health Care Act, for the processing of information about medical services for both general practitioners and specialists. In addition, personal data is used to collect employer information, patient billing information, statistical data, teaching and scientific research.

Työplus Yhtiöt Oy's patient registry consists of electronic and manual patient history data, which is protected in accordance with Työplus Yhtiöt Oy's data security guidelines.

5. Data content of registry

Patient identification and contact info

- First name, last name, personal identification number, address, telephone number, e-mail address, profession/occupation
- Employer information
- Health status and health risk identification and monitoring studies carried out and their results
- Consultation requests and replies from service units outside Workplus
- Treatment planning and treatment decisions with explanations
- Certificates
- Requests and responses from external service providers for laboratory and X-ray examinations
- Appointment information

Organizational customers

- Agreement data
- Personnel data of customers' company
- Invoicing information of customers' company
- Clarifications concerning the workplace
- Business plan of customers' company

6. Data sources

- The customer information is from the agreements made with the customer.
- Information received directly from the customer/patient.
- via eTyöplus online services. Movendos Oy, the provider of the OmaPlus and YritysPlus services, and Odum Oy, the provider of the OmaOdum service, collect information from the user when the user registers for the service, updates their information and uses the service (eg discussions, form responses).
- Information obtained with the consent of the client / patient from his / her relatives / contact person
- Information generated in the health unit

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- Information obtained from other organizations with the patient's consent.

7. Timely release of data

Patient records are confidential (Patient Status and Rights Act (785/1992) Section 13 "Patient Act") and staff and health care professionals are bound by a duty of confidentiality with respect to any information obtained in connection with patient care.

We generally disclose patient information with the individual consent of the patient, or unless expressly required by law. If the patient does not have the ability to assess the significance of the consent given, the information may be provided with the consent of his or her legal representative.

Pursuant to the Act on Electronic Processing of Customer Information in Social and Health Care (784/2021) ("Customer Information Act"), a continuous patient record is recorded by professionals in the Patient Information Archive maintained by Kela.

Information stored in the eTyöplus online service will not be released to any information systems outside the same registry without the individual consent of the registered patient.

Patient information is disclosed to authorities and other entities that have a legal right of access.

Government agencies:

Stakes

- cancer registry (manually)

Fimea

- side effects of medicine registry (manually)
- side effects of vaccination registry (manually)

THL

- infectious disease registry (manually)
- Vaccination data (Avohilmo)

8. The transfer of data outside the EU or EEA

Personal data processed by Työplus Yhtiöt Oy and the eTyöplus online service will not be transferred outside the EU or the EEA.

9. Principles of registry protection

A. Manual material (place of storage and protection)

Patient records are stored in the Työplus Yhtiöt Oy's patient registry archive, and upon completion of treatment, are transferred to a patient records archive that complies with the provisions of the Archives Act. Access to documents is monitored.

B. Electronically stored data (principles of access to and control of the registry and physical protection of equipment)

Työplus Yhtiöt Oy has agreed upon the principles approved by the Leading Doctor, according to which access rights are granted by employee groups. All users sign the user commitment agreement. All personnel have verification cards for logging into the patient information system. The access rights for substitutes are granted only for the duration of the replacement. The patient data registry system log file records all visits to patient files, and the log files are checked at random intervals. The IT devices and servers are located in secure and controlled premises.

The creation, use, storage, archiving, removal, and other processing of data is governed by a file formation plan and privacy and security policies.

All personal data is confidential and subject to the provisions of professional secrecy and document confidentiality.

The information contained in Työplus Yhtiöt Oy's electronic remote services OmaPlus and YritysPlus services is stored on the servers maintained by the service provider Movendos Oy and the OmaOdum services are stored on the servers maintained by the service provider Odum Oy which are physically located within the EU or the EEA. Processing of user information

requires a personal username and password. Access to the user's personal information is restricted to persons whose work requires them to perform their duties. Data is transferred between the server and the user over an encrypted connection.

10. Inspection right

According to the Privacy Policy, you have the right to know what information about you / the person you represent is stored in the registry maintained by Työplus Yhtiöt Oy.

- the right of inspection shall be exercised without delay
- the right of inspection may be refused only in exceptional cases
- the refusal could, for example, be based on the fact that providing the information could seriously endanger the health and treatment of the client / patient or the rights of others.
- exercise of the right of inspection is free of charge once a year.
- the right of access shall be exercised either through a personal visit or by the means of a handwritten application request form.

The inspection request for registry data application form is found on the Työplus Yhtiöt Oy's website.

11. The right to ask for correction of data

You have the right under the data protection Privacy Regulation to request that inaccurate or incorrect information concerning you be corrected, and any missing information be added.

If you would like your personal or patient information to be corrected, make a written correction claim and personally submit it to the Työplus Yhtiöt Oy site where you visited. When you submit your request, your identity will be verified in a reliable manner, such as your driver's license, ID card or passport. The request will be handled by the healthcare professional who has taken care of you or by the Leading Doctor of Työplus Yhtiöt Oy.

If, despite the views you have expressed, the physician or other health care professional treating you doesn't consider that the information concerning you as inaccurate or incorrect for the

purpose of the treatment, the information cannot be corrected. In addition, patient data cannot be corrected if it is contrary to the instructions of the Ministry of Social Affairs and Health.

The claim for correction will be noted whether it has been accepted or rejected. If the customer's claim is justified, any incorrect entries will be corrected and sent to the "Kanta" Archive (name, position and date of the editor). If the claim is rejected, a justification for the rejection shall be entered on the form. You have the right to bring the matter before the European Data Protection Supervisor (EDPS).

The correction request form is found on the Työplus Yhtiöt Oy's website.