

## PRIVACY POLICY

Created: 16.5.2012 H.Rintala  
Revised: 31.10.2024 H.Rintala  
Approved: Data security committee

<b>1. Registry owner</b>	Työplus Yhtiöt Oy Mariankatu 26, 67200 KOKKOLA tel. 06 828 7360, info@tyoplus.fi
<b>2. Responsible person and contact person of registry</b>	Chief Medical Officer Outi Paloneva outi.paloneva@tyoplus.fi  Data Controller Kaisa Myllymäki kaisa.myllymaki@tyoplus.fi  Vitec Acute Oy is responsible for technical functionality, Service Director Juuso Heponeva, tel. +358 44 531 0422, juuso.heponeva@vitecsoftware.com  IT Manager Matias Karlström, puh. 044 7809 511, matias.karlstrom@kokkola.fi  IT support person Niko Ylipekka, puh. 040 806 5928, niko.ylipekka@tyoplus.fi
<b>3. Registry name</b>	<b>Patient Data System Acute TT2000</b>
<b>4. Purpose of handling personal data</b>	<p>Personal data is used in the context of customer relationships for preventive services based on the Occupational Health Care Act, as well as for processing information related to general and specialist medical care services. Personal data is utilized for the planning and implementation of examinations and treatments.</p> <p>Patient register data is also used for:</p> <ul style="list-style-type: none"><li>- Referring and organizing the patient's follow-up care</li><li>- Monitoring the activities of healthcare professionals</li><li>- Resolving potential compensation claims</li><li>- Billing for the patient's care and examinations</li><li>- Scientific research</li><li>- Healthcare education</li><li>- Ensuring the quality and effectiveness of care</li><li>- Planning, development, statistical analysis, and monitoring of operations</li><li>- Tasks required to fulfil the rights and obligations of the data controller</li></ul> <p>Legal bases for data processing:</p> <ul style="list-style-type: none"><li>- The customer relationship between the data controller and the data subject</li><li>- Processing is necessary for preventive healthcare or occupational health services.</li><li>- Customer data is processed only to the extent required by work tasks and responsibilities.</li></ul>

	<p>The processing of personal data is based on the following regulations:</p> <ul style="list-style-type: none"> <li>- General Data Protection Regulation (EU) (679/2016)</li> <li>- Data Protection Act (1050/2018)</li> <li>- Occupational Health Care Act (1383/2001)</li> <li>- Health Care Act (1326/2010)</li> <li>- Act on the Processing of Client Data in Social and Health Care (703/2023)</li> <li>- Decree of the Ministry of Social Affairs and Health on Patient Records (94/2022)</li> <li>- Decree of the Ministry of Social Affairs and Health on Access to Client Data (825/2022)</li> <li>- Act on the Status and Rights of Patients (785/1992)</li> <li>- Archives Act (831/1994)</li> </ul>
<p><b>5. Data content of registry</b></p>	<p><b>Patient Data System Acute</b></p> <p>Organizational Clients:</p> <ul style="list-style-type: none"> <li>- Contract details</li> <li>- Personnel information of client companies</li> <li>- Billing information of client companies</li> <li>- Operational plans of client companies</li> <li>- Workplace-related reports</li> </ul> <p>Customer Identification and Contact Information:</p> <ul style="list-style-type: none"> <li>- First and last name, personal identification number, municipality of residence, address, phone number, email address, profession</li> <li>- Employer information</li> <li>- Assessment of health status and health risks, and health monitoring</li> <li>- Completed examinations and their results</li> <li>- Consultation requests and responses from external service units outside Työplus</li> <li>- Treatment planning and treatment decisions with justifications</li> <li>- Certificates</li> <li>- Laboratory and radiology examination requests and responses from external service providers</li> <li>- Appointment details</li> </ul>
<p><b>6. Regular sources of data</b></p>	<p>Company information is obtained from the agreement made with the company.</p> <p>Information provided directly by the customer.</p> <p>Information provided by the customer's relatives or contact person with the customer's consent.</p> <p>Information generated within the care unit.</p> <p>Customer information is accessible through the Patient Data Archive with the customer's consent when needed for their care.</p> <p>Through <b>eTyöplus</b> online services. The providers of the OmaPlus and YrityPlus services, Movendos Oy, and the provider of the OmaOdum service, Odum Oy, collect information from the user when the user registers for the service, updates their information, and uses the service (e.g., conversations, form responses).</p> <p>Information obtained from other organizations with the customer's consent.</p>

<p><b>7. Regular disclosure of data</b></p>	<p>To the customer</p> <p>The processor of personal data does not disclose customer information to external parties. Information may only be disclosed with the customer's consent, in accordance with the terms of the disclosure permission.</p> <p><b>Kela's Prescription Centre</b></p> <p>The patient's electronic prescriptions are stored in the Prescription Centre, with Kela serving as the data controller. For more information, visit [www.kanta.fi]</p> <p><b>Kanta Patient Data Archive</b> Based on the Act on the Electronic Processing of Social and Healthcare Client Data; the Act on the Processing of Social and Healthcare Client Data (703/2023), the continuous patient records documented by professionals are archived in the Patient Data Archive of the Kanta Services maintained by Kela.</p> <p><b>Occupational Disease Registry</b></p> <p><b>Stakes</b></p> <ul style="list-style-type: none"> <li>- Cancer registry</li> </ul> <p><b>Fimea</b></p> <ul style="list-style-type: none"> <li>- Medication Side Effect Registry</li> <li>- Vaccination Adverse Effect Registry</li> </ul> <p><b>THL</b></p> <ul style="list-style-type: none"> <li>- Infectious Disease Registry</li> </ul> <p>Volume Data Provided in Group Reporting</p> <p>To authorities and other entities and service providers with a legal right to access the information.</p>
<p><b>8. Transferring data outside of the EU or EEA area</b></p>	<p>Information from the customer register is not disclosed outside the EU or EEA.</p>
<p><b>9. Principles of registry protection</b></p>	<p>The registry is handled with care, and information processed through information systems is appropriately protected. The data controller ensures that stored information, server access rights, and other data critical to personal data security are handled confidentially and only by employees whose job descriptions include such responsibilities.</p> <p><b>A. Manual material</b></p> <p>Patient records are stored in locked cabinets under supervision in office spaces. Upon the conclusion of treatment, the documents are transferred to the patient record archive, which complies with the provisions of the Archives Act. The use of the documents is monitored.</p>

	<p><b>B. Electronically stored data</b></p> <p>The data controller ensures that registry information is handled confidentially and only by employees whose job descriptions include such responsibilities. Työplus Yhtiöt Oy has established principles for granting access rights based on employee groups. All users are required to sign a user agreement.</p> <p>Staff members use access cards to log in to the patient information system. Temporary employees are granted access rights only for the duration of their assignment. All visits to patient records are logged in the system, and log files are regularly reviewed through random checks.</p> <p>All personal data is confidential and subject to regulations concerning confidentiality and document secrecy.</p> <p>IT equipment and servers are located in secured and monitored facilities.</p> <p>The creation, use, storage, archiving, disposal, and other processing of data are guided by archiving plans, as well as data protection and security guidelines.</p> <p>The staff is trained and their skills maintained through supplementary training on data protection and information security.</p> <p>Information contained in Työplus Yhtiöt Oy's digital remote services, OmaPlus and YritysPlus, is stored on servers managed by the service provider Movendos Oy. Similarly, data from OmaOdum services is stored on servers managed by Odum Oy. These servers are located within the EU or EEA.</p> <p>The processing of user data requires a personal username and password. Access to personal user information is restricted to individuals whose job duties necessitate the use of such data. Data transfer between the server and the user occurs over an encrypted connection.</p>
<p><b>10. Storage period of data</b></p>	<p>The retention, archiving, and disposal of healthcare patient records are defined by legislation. Generally, patient records are retained for 12 years after death or 120 years from birth.</p>
<p><b>11. Rights of the registered</b></p>	<p>Each customer listed in the registry has the following GDPR rights:</p> <p>A. Right to access personal data (Article 15)</p> <ul style="list-style-type: none"> <li>- Customers can view their documents prepared by Työplus in the Patient Data Archive through the Omakanta service.</li> <li>- The data subject has the right to request access to their personal data.</li> <li>- The right of access will be implemented without undue delay.</li> <li>- The right of access can only be denied in exceptional cases, such as if providing the information could pose a serious risk to the customer's health or treatment, or the rights of others.</li> <li>- Exercising the right of access is free of charge once a year.</li> </ul> <p>- Access to personal data can be provided during an in-person visit or through a signed Personal Data Inspection Request Form.</p>

	<p><b>B. Right to Rectify Data (Article 16)</b></p> <ul style="list-style-type: none"> <li>- The data subject has the right to request the correction of incorrect information concerning them in the registry.</li> <li>- The data controller must, without undue delay, either on their own initiative or at the request of the customer, rectify, delete, or supplement any incorrect, unnecessary, incomplete, or outdated information in the customer registry relevant to the purpose of processing.</li> <li>- The rectification request must be made in writing.</li> </ul> <p><b>C. Right to Removal (Article 17)</b></p> <ul style="list-style-type: none"> <li>- The data subject has the right to request the data controller to delete any data that is unnecessary or incorrect for the purpose of use. The right to removal does not apply to legally mandated registries.</li> <li>- The request for data removal must be made in writing.</li> </ul> <p><b>D. Right to Transfer Data from one system to another (Article 20)</b></p> <ul style="list-style-type: none"> <li>- The data subject has the right to transfer their personal data from one system to another, provided the processing is based on consent or a contract, and it is carried out automatically.</li> <li>- The data subject also has the right to have their data transferred directly from one data controller to another, if technically feasible.</li> <li>- The right to transfer data does not apply to legally mandated registries.</li> </ul> <p><b>E. Right to Make a Complaint with a Supervisory Authority (Article 77)</b></p> <ul style="list-style-type: none"> <li>- The data subject has the right to file a complaint with the supervisory authority, the Office of the Data Protection Ombudsman, if they believe that the processing of their personal data violates the GDPR.</li> </ul> <p><b>Office of the Data Protection Ombudsman</b>  PL 800, 00531 Helsinki  tel. 029 566 6700  www.tietosuoja.fi</p>
<p><b>12. Organisation handling the data</b></p>	<p>Työplus Yhtiöt Oy, Työplus Oy, Vitec Acute Oy</p>