

Updated 2 June 2021

<b>1 Data controller</b>	<p><b>Name:</b> Orton Oy (Business ID 2280979-1)</p> <p><b>Address:</b> Tenholantie 10 FI-00280 Helsinki</p> <p><b>Contact information</b> telephone number exchange +358 9 4748 2705 email address: orton@orton.fi</p>
<b>2 Persons responsible for the register</b>	<p>Person responsible for the register: Orton Oy Patient Ombudsman Kaija Lamberg.</p> <p>The above responsible person processes, for example, requests for error rectification or data erasure.</p>
<b>3 Data Protection Officer</b>	<p>Sonja Åkerlund Data Protection Officer</p> <p>Postal address: Orton Oy, Tenholantie 10, FI-00280 Helsinki email: tietosuojavastaava@orton.fi</p>
<b>4 Contact details in matters concerning the register</b>	<p>Markus Orava Chief Executive Officer</p> <p>Orton Oy, Tenholantie 10, FI-00280 Helsinki markus.orava@orton.fi, telephone: +358 9 47481</p>
<b>5 Name of the register</b>	<b>PATIENT REGISTER</b>
<b>6 Purpose of processing personal data</b>	<p>The register has been established for health services provided by the data controller.</p> <p>The register data is used for: the organisation, planning, implementation, monitoring and quality control of the patient's examination and treatment: invoicing the patient's treatment and examination; monitoring the activities of professionals and investigating possible damages or actions; planning, statistics, monitoring and evaluation of activities, as well as scientific research.</p>

<b>7 Basis for the processing of personal data</b>	<p>The processing of personal data described above is based e.g. on the following provisions:</p> <ul style="list-style-type: none"> <li>• EU General Data Protection Regulation 2016/679, Article 6(1)(c) and (e)</li> <li>• Health Care Act 30.12.2010/1326</li> <li>• Act on the Electronic Processing of Client Data in Healthcare and Social Welfare, 9.2.2007/159</li> <li>• Act on Specialized Medical Care, 1.12.1989/1062</li> <li>• Mental Health Act, 14.12.1990/1116</li> <li>• Archives Act, 23.9.1994/831</li> <li>• Act on Health Professionals, 28.6.1994/559</li> <li>• Act on the Status and Rights of Patients, 17.8.1992/785</li> <li>• Decree of the Ministry of Social Affairs and Health on patient documents, 30.3.2009/298</li> </ul>
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<b>8 Data content of the register</b>	<p>The patient register includes the patient's service events and related medical records of the course of illness and treatment, examination orders, examination statements and results, and related technical records. The patient register consists of the patient information system, the patient information systems for the service provider's medical services (HUS Helsinki University Hospital), and patient documents in paper form.</p> <p>The personal data needed to identify the patient and arrange the service are stored in the patient register: name and personal identity code, domicile, address, telephone number, patient's mother tongue / language of communication, contact person designated by the patient, if necessary, guardian(s) of a minor or contact details of the patient's legal representative.</p> <p>The patient register also includes information received from other health care units that is necessary for treatment.</p> <p>Personal and guardian data and contact details of the patient, the care and other information necessary to ensure the organisation, planning, implementation and monitoring of the patient's examination and treatment; invoicing and quality control information concerning treatment; information to be submitted to statutory national registers.</p>
<b>9 Regular data sources</b>	<p>Data is obtained from:</p> <ul style="list-style-type: none"> <li>• the data subject himself/herself</li> <li>• necessary personal data and contact details provided by a family member or guardian</li> <li>• through Orton Oy's own operations in connection with treatment</li> <li>• through the service provider (HUS)</li> <li>• the Population Register Centre (personal data) through the service provider (HUS)</li> </ul>

<b>10 Categories of recipients of personal data</b>	<p>Recipients related to treatment:</p> <ul style="list-style-type: none"> <li>• patients</li> <li>• health care units responsible for further treatment of patients</li> <li>• health care units and doctors who refer patients to Orton Oy</li> </ul> <p>Recipients to whom Orton Oy is legally entitled or obligated to disclose data:</p> <ul style="list-style-type: none"> <li>• insurance companies and institutions □ supervisory authorities such as <ul style="list-style-type: none"> <li>○ the Regional State Administrative Agency</li> <li>○ Office of the Data Protection Ombudsman</li> <li>○ Valvira</li> </ul> </li> <li>• municipal social services</li> <li>• judicial authorities</li> <li>• the police</li> </ul>
<b>11 Regular disclosures of data</b>	<p>Care data or other sensitive information will not be disclosed outside the controller without the patient's permission or a legal right or obligation (e.g. Child Welfare Act, 13.4.2007/417).</p> <p>The information on which invoicing is based is disclosed to the outsourced service provider responsible for invoicing for the controller.</p>
	<p>Patient records in the service provider's (HUS) information systems are also copied from HUS's patient information systems to the HUS Data Pool, from which the data is submitted pseudonymised to partners involved in scientific research and the CleverHealth Network project.</p>
<b>12 Retention period for patient documents</b>	<p>The retention period for patient documents is laid down by the Decree of the Ministry of Social Affairs and Health on patient documents (30.3.2009/298). As a rule, the retention period is 12 years from the patient's death or, if not known, 120 years from the patient's birth.</p>

<b>13 Rights of the data subject</b>	<p>The data subject has the following rights:</p> <ul style="list-style-type: none"> <li>• Right of access to personal data (Article 16) ○ the data subject may submit an electronic request for information via the security mail found on the company's website <ul style="list-style-type: none"> <li>○ to send a request for information by letter</li> </ul> </li> <li>• Right to rectification (Article 16) ○ the data subject may submit a written claim for rectification</li> <li>• Right to erasure (Article 17) ○ the data subject may request the erasure of data that is unnecessary or incorrect for the purpose of the register</li> <li>• Right to restriction of processing (Article 18) ○ the data subject may make a free-form claim, which is always processed on a case-by-case basis</li> <li>• Right to objection (Article 21) ○ the data subject may make a free-form claim, which is always processed on a case-by-case basis</li> <li>• Right to transfer data from one system to another (Article 20) ○ the data subject may make a free-form claim, which is always processed on a case-by-case basis</li> </ul> <p>Instructions and mailing addresses can be found on Orton Oy's website.</p> <p>In certain situations, the data controller may, for justified reasons, refuse to comply with the data subject's claims. For example, a claim for complete erasure of data cannot be accepted because the retention period and obligation to retain data are provided for by law. However, an identified rectification or erasure claim will be implemented if Orton Oy's healthcare professional states that the data is clearly incorrect or unnecessary for the purpose of the patient register.</p>
<b>14 Transfer of data outside the EU or EEA</b>	<p>Only with the consent of the data subject.</p>
<b>15 Principles of register protection</b>	<p><b>A Electronically processed data</b> Secret matters and documents are protected by role-based access management of patient information systems. User rights to patient information systems are granted on a role-based basis, on the basis of work tasks.</p> <p><b>B Manual material</b> Material in paper form is stored in locked spaces, which are accessible only to persons processing related matters or documents.</p>
<b>16 Right to lodge a complaint with the supervisory authority</b>	<p>Without prejudice to other administrative appeals or remedies, every data subject has the right to lodge a complaint with the supervisory authority, in particular in the Member State in which he or she has a habitual residence or place of employment or where the alleged breach has occurred, if the data subject considers that the processing of personal data concerning him or her is in breach of the EU General Data Protection Regulation.</p>

	<p>Details of the supervisory authority:</p>
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**Office of the Data Protection Ombudsman**

Visiting address: Ratapihantie 9, 6th floor, FI-00520 Helsinki

Postal address: P.O. Box 800, FI-00521 Helsinki

Exchange: +358 29 56 66700

Fax: +358 29 56 66735

Email: tietosuoja(at)om.fi