Privacy statement for patient register

RegulCCation 2016/679 of the European Parliament and of the Council (EU General Data Protection Regulation)

Updated 1 November 2024

1 Data controller	**Name:** Orton Oy (Business ID 2280979-1) **Address:** Tenholantie 10 FI-00280 Helsinki **Contact information** telephone number exchange +358 9 4748 2705 email address: orton@orton.fi
2 Persons responsible for the register	Person responsible for the register: Orton Ltd Medical Director Contact person of the register: Orton Ltd patient contact person. The above are responsible persons of the processes, for example, requests for error rectification or data erasure.
3 Data Protection Officer	Data Protection Officer Postal address: Orton Ltd, Tenholantie 10, FI-00280 Helsinki email: tietosuojavastaava@orton.fi
4 Contact details in matters concerning the register	Patient contact person Orton Oy, Tenholantie 10, FI-00280 Helsinki potilasasiat@orton.fi
5 Name of the register	**PATIENT REGISTER**
6 Purpose of processing personal data	The register has been established for health services provided by the data controller. 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.

7 Basis for the processing of personal data	The processing of personal data described above is based e.g. on the following provisions: • EU General Data Protection Regulation 2016/679, Article 6(1)(c) and (e) • Health Care Act 30.12.2010/1326 • Act on the Electronic Processing of Client Data in Healthcare and Social Welfare, 9.2.2007/159 • Act on Specialized Medical Care, 1.12.1989/1062 • Mental Health Act, 14.12.1990/1116 • Archives Act, 23.9.1994/831 • Act on Health Professionals, 28.6.1994/559 • Act on the Status and Rights of Patients, 17.8.1992/785 • Decree of the Ministry of Social Affairs and Health on patient documents, 30.3.2009/298
8 Data content of the register	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. 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. The patient register also includes information received from other health care units that is necessary for treatment. 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.
9 Regular data sources	Data is obtained from: • the data subject himself/herself • necessary personal data and contact details provided by a family member or guardian • through Orton Oy's own operations in connection with treatment • through the service provider (HUS) • the Population Register Centre (personal data) through the service provider (HUS).
10 Categories of recipients of personal data	Recipients related to treatment: • patients • health care units responsible for further treatment of patients • health care units and doctors who refer patients to Orton Oy Recipients to whom Orton Oy is legally entitled or obligated to disclose data: • insurance companies and institutions such as • supervisory authorities, such as o the Regional State Administrative Agency o Office of the Data Protection Ombudsman o Valvira

	• municipal social services • judicial authorities • the police
11 Regular disclosures of data	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). The information on which invoicing is based is disclosed to the outsourced service provider responsible for invoicing for the controller. 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.
12 Retention period for patient documents	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.
13 Rights of the data subject	The data subject has the following rights: • 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 ○ to send a request for information by letter • Right to rectification (Article 16) ○ the data subject may submit a written claim for rectification • 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 • 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 • Right to objection (Article 21) ○ the data subject may make a free-form claim, which is always processed on a case-by-case basis • 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 Instructions and mailing addresses can be found on Orton Oy's website. 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.
14 Transfer of data outside the EU or EEA	Only with the consent of the data subject.

15 Principles of register protection	The data contained in the Patient Information Register is confidential and the persons involved in the processing of the data are sworn to confidentiality and secrecy. This obligation of confidentiality and secrecy continues even after employment ends. Access to patient information is restricted to those who need to process patient information due to their role, and they may only process the data to the extent required by their role and responsibilities. **Data to be processed electronically** We use a wide range of physical, technical and administrative safeguards to protect personal data and to ensure the safe processing of personal data. These safeguards include, but are not limited to, controlled access to patient information systems based on the employee's role, monitoring of the access rights, the use of modern firewall and encryption techniques, provision of training/education to the personnel involved in the processing of personal data, and managing the risks related to the design, implementation and maintenance of the services. The processing of patient information is monitored as required by law, such as through log data. Orton Oy has various agreements/arrangements in place to ensure that subcontractors, too, process the data in accordance with law and good data protection practice. The safeguards meet the needs of the services and functions currently in use. **Manual materials** Material in paper format is kept in locked rooms which may only be accessed by persons who handle these matters or documents.
16 Right to lodge a complaint with the supervisory authority	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. Details of the supervisory authority: **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