

## PRIVACY POLICY FOR HUS ACCESS GATEWAY (HAG) SERVICES

Updated 7.6.2019

### 1 DATA CONTROLLER

This privacy policy applies to the clients of services HUS HAG Services. HUS serves as the data controller for these clients.

#### Address

HUS Joint Authority  
Stenbäckinkatu 9  
P.O. Box 100, 00290 Helsinki  
Business ID: 1567535-0

#### Contact information

Switchboard: +358 (0)9 4711  
Central Registry telefax +358 (0)9 471 75500,  
Central Registry email [keskuskirjaamo@hus.fi](mailto:keskuskirjaamo@hus.fi)  
Mailing address:  
HUS/Central Registry  
PO Box 200, 00029 HUS

### 2 NAME OF THE PERSON RESPONSIBLE FOR DATA PROTECTION

Petri Hämäläinen  
Development Director  
Mailing address: P.O. Box 440, FIN-00029 HUS  
Email: [petri.hamalainen@hus.fi](mailto:petri.hamalainen@hus.fi)

### 3 PURPOSE OF THE CLIENT REGISTER AND LEGAL BASIS FOR DATA PROCESSING

The processing of client data is based on applicable laws or the client's consent.

Data stored in the client register is used for the planning, implementation and evaluation of client treatment and rehabilitation as well as other purposes that are in compliance with applicable laws and recommendations.

The processing of the above-mentioned data is based on the following laws and regulations:

- EU General Data Protection Regulation 2016/679 (Article 6, Paragraphs 1 (c) and (e))
- Health Care Act (Terveydenhuoltolaki) 30.12.2010/1326
- Act on the Electronic Processing of Client Data in Healthcare and Social Welfare (Laki sosiaali- ja terveydenhuollon asiakastietojen sähköisestä käsittelystä) 9.2.2007/159
- Act on Specialised Medical Care (Erikoissairaanhoitolaki) 1.12.1989/1062
- Mental Health Act (Mielenterveyslaki) 14.12.1990/1116
- Archive Act (Arkistolaki) 23.9.1994/831
- Act on Health Care Professionals (Laki terveydenhuollon ammattihenkilöistä) 28.6.1994/559
- Act on the Status and Rights of Patients (Laki potilaan asemasta ja oikeuksista) 17.8.1992/785
- Decree of the Ministry of Social Affairs and Health on patient records (Sosiaali- ja terveysministeriön asetus potilasasiakirjoista) 30.3.2009/298

## 4 DATA CONTENT OF THE CLIENT REGISTER

The separate user terms describe the details to be stored. The information includes mainly the person's name, personal identification number and contact information.

### 4.1 Regular sources of data

The information is obtained from the Population Register Center when the person is identified at Suomi.fi. In addition, the person can save their own contact information to the service.

### 4.2 Retention period

Personal data stored in client registers is retained in accordance with valid regulations concerning data retention periods.

## 5 DISCLOSURE OF CLIENT DATA

Client data is confidential and all personnel are subject to confidentiality obligations.

Client data may be disclosed:

- to the client or his/her legal representative with express consent of the client.
- under an applicable regulatory provision.

### 5.1 Transfer of data outside the EU

Data is not transferred outside the European Union without the express consent of the client.

## 6 GENERAL PRINCIPLES ON THE USE AND PROTECTION OF DATA

Confidential matters and documents are protected by means of role-based access control.

## 7 RIGHTS OF THE DATA SUBJECT

The data subject has the following rights:

- Right of access (Article 16)
  - The data subject may submit an electronic request for information on the HUS website or
  - send a request for information by post
- Right to rectification (Article 16)
  - The data subject may request the rectification of inaccurate or incomplete personal data concerning him/her in writing
- Right to erasure (Article 17)
  - The data subject may request the erasure of unnecessary or inaccurate personal data concerning him/her in the register

Right to restriction of processing (Article 18)

- The data subject may submit a free-form request to restrict the processing of his/her data on a case-by-case basis
- Right to object (Article 21)
  - The data subject may submit a free-form request to restrict the processing of his/her data on a case-by-case basis
- Right to data portability (Article 20)
  - The data subject may submit a free-form request to restrict the processing of his/her data on a case-by-case basis

Guidelines, forms and mailing addresses can be found on the HUS website under [Patients -> Patient documents](#)

The data subject can request his/her own information erasing from HAG-service as self service by authenticating to the service at <https://hushag-ig.hus.fi/identity/>

In certain cases, the data controller may, for a legitimate reason, decline requests submitted by the data subject. For example, a request for the complete erasure of data cannot be honoured because the data retention period and obligation are legally mandated. However, requests for rectification or erasure may be honoured if a HUS health care professional determines that the data in question is clearly inaccurate or unnecessary where use of the patient register is concerned.

## 8 PERSONAL DATA RECIPIENT GROUPS

The electronic services for which the person performs identification.

## 9 RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

Every data subject has the right to lodge a complaint with a supervisory authority, particularly in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal data concerning him/her infringes the EU General Data Protection Regulation, however, without restricting other administrative appeals or legal remedies.

Supervisory authority information:

### **Office of the Data Protection Ombudsman**

Street address Ratapihantie 9 (6th floor), 00520 Helsinki

Mailing address: P. Box 800, 00521 Helsinki

Switchboard: +358 (0)29 56 66700

Fax: +358 (0)29 56 66735

Email: tietosuoja(at)om.fi

## 10 CONTACT

The data subject must contact the data controller in all matters involving the processing of personal data and all situations involving the exercising of individual rights. If necessary, HUS may request that the data subject submit his/her request in writing and it may be necessary to verify the identity of the data subject prior to taking any action.