



9.12.2022

Suomen Neurolaboratorio Oy Privacy Policy

1. Controller

Suomen Neurolaboratorio Oy
Yliopistonkatu 19 A, FI-20100 Turku, FINLAND
Tel. +358 (0)2 4140800, email: info@neurolaboratorio.fi

2. Contact person in matters concerning the registry

Sanna Leivo, Data Protection Officer, Yliopistonkatu 19 A, FI-20100 Turku, FINLAND
Tel. +358 (0)2 4140800, email: sanna.leivo@neurolaboratorio.fi

3. Name of registry

Suomen Neurolaboratorio Oy's Patient and Customer Registry (common registry)

4. Purpose and basis of personal information handling

Personal information can be handled for the following purposes:

- Patients'/clients' data regarding appointments as well as planning, implementation and archiving of examinations and treatment
- Invoicing and collection
- Contact details of referring physicians and organisation
- Client satisfaction surveys
- Development of operations
- Tracking the location of the nocturnal polygraphy device if the device has not been returned within the agreed time.

The gathering of personal information is based on legislative obligation, client consent, assignment given by the client, or some other appropriate connection.

5. Personal information groups and registry-based information content

- Patient's/client's basic information (name, national identification number, contact information: address and telephone number as well as the name and contact information concerning the parent/guardian of a minor child)
- Authorisations and prohibitions concerning the handling of information provided by a patient/client
- Examination referrals, statements and printouts
- Video and audio recordings connected with examination registrations
- Information concerning the patient's/client's health status
- Information concerning appointments, invoicing and client visits
- Client satisfaction surveys
- Name and position of entry author and entry time/date
- Location information for nocturnal polygraphy device on the night of registration.



6. Regulatory information sources

- Patient/client him/herself. The authenticity of the information is checked in connection with the visit.
- Examination referrals, statements and printouts that are produced by a third party or the result of one's own activities.
- Other care facilities and KANTA archive. Documents available with the consent of a person or the parent/guardian of a minor child.

7. Regulatory transfers of information

Patient registry information must be kept secret. The personnel are subject to the duty of confidentiality. The patient/client is not required to separately request non-disclosure of his/her information.

- Statements of findings / printouts are transferred personally to the patient as long as there is no legislative obstacle.
- To the delivering health care unit on a contractual basis.
- Based on specific legal provisions to public authorities, examination institutes and insurance companies.
- A statement of findings / printouts may also be disclosed to third parties with the written permission of a person him/herself or the parent/guardian of a minor child. The transfer of information occurs either electronically or as paper printouts from electronic medical records or as a copy of manual data. (Entries starting 25/01/2017 have been switched to the patient information archive (KANTA archive) maintained by KELA (the Social Insurance Institution of Finland).
- The patient/client has the right at any time to change the types of consent or prohibitions s/he has provided with respect to transfer of information.

The Dynamic Health patient information system, whose technical maintenance and storage is the responsibility of Tieto Oyj, is in use. Analystica Oy is in charge of the upkeep of surveys and related data.

8. Transfer of information outside the EU or EEA

Information is not transferred outside the EU or EEA.

9. The storage period of personal information and specification criteria regarding the storage period

Patient documents as well as statements of findings and printouts are stored in accordance with the retention period separately specified by law. Other personal information than patient information is stored during the valid period of the client relationship. Location information for nocturnal polygraphy device is only used when the device is in the patient's possession. The location information will not be saved.

10. Principles of registry protection



Manual archive: manual materials are stored in lockable archive cabinets and boxes in the office. Access to the materials is restricted to the caregivers working in the office. No log information capabilities.

Information processed by ADP: electronically recorded information is protected via electronic access rights. Users have personal passwords and IDs for the information system. Passwords must not be given to others to use. User rights are issued to the extent that the work tasks concerned require them. Passwords are changed with sufficient regularity. The use of information systems is supervised by means of log files.

The ADP system is protected against malware and by a firewall.

11. Rights of the data subject

The patient has the right to inspect the patient registry information concerning him/herself as well as the log of the patient information system, i.e., the event information, free of charge. The controller can levy a reasonable administrative fee for repeated inspection requests over a short period of time. A request for log information may extend at maximum to the previous two years. No right is granted to obtain log information older than two years without special reason. A request should be made by means of a written log information inspection request form, which is to be delivered to the data protection officer at Suomen Neurolaboratorio. Right of inspection can be denied in the event that the information may cause a serious threat to the patient's health, care, or to the rights of someone else. The information is transferred to the patient in writing or for viewing on the spot. The patient's identity is checked before transferring the information.

The patient has the right to demand the correction or removal of erroneous information in the patient registry. This demand is to be presented in writing and delivered to Suomen Neurolaboratorio's data protection officer, who will make a decision regarding the amendment.

The patient has the right to request restriction of the handling of his/her personal information. In addition, the patient has the right at any time to cancel his/her consent to the handling of personal information. This can affect the usability of the service.

Suomen Neurolaboratorio shall endeavour to resolve disagreement concerning the handling of information directly with the patient. Nevertheless, the patient shall have the right to make a complaint to the supervisory authority in the event that s/he is of the view that the controller has not observed the proper procedures in his operations in compliance with the law.

12. Other rights and obligations associated with the handling of personal information

In the case of remote offices (other than the Yliopistonkatu street office), the technical maintenance of the patient register and performance of the obligations related to the registry have been agreed on a contractual basis so that, as a general rule, the customer organization has the obligation to maintain the register and the Suomen Neurolaboratorio acts as the processor of the register data.



SUOMEN NEUROLABORATORIO

Yliopistonkatu 19A 20100 Turku, puh. 02 4140800, www.neurolaboratorio.fi

The data produced by the measuring devices are archived at the Yliopistonkatu street office in accordance with the healthcare service provider's obligation.