



Privacy policy

EU General Data Protection Regulation (2016/679)

26.3.2021

## **Patient register**

### **1. Controller**

The Board of the City of Helsinki's occupational health institute (Occupational Health Helsinki). The controller duties have been delegated to the Managing Director. (Board decision, 16 May 2018, section 14 of the record)

### **2. Person in charge of the register**

#### **Title**

Occupational Health Helsinki/Managing Director

### **3. Contact person for the register**

#### **Title**

Occupational Health Helsinki's patient representative

#### **Contact information**

City of Helsinki, Registrar's Office P.O. Box 10 (Pohjoisesplanadi 11–13), 00099 City of Helsinki

## **4. Purposes of the processing of personal data and the legal grounds for the processing**

### **Purposes of the processing**

The register's main purpose is to register information related to the health state and occupational conditions of Occupational Health Helsinki's employees for the purposes of legislated occupational healthcare.

In addition to providing the services, the registered data will be used for invoicing, statistics, occupational health reports and developing the services. General data will also be produced from the system for the annual report of the employer's occupational healthcare services.

### **Legal grounds for the processing**

The legal grounds for the processing are items c and e of article 6 subsection 1, of the EU's General Data Protection Regulation; processing is necessary for compliance with a legal obligation to which the controller is subject, and processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The regulation's subsection is specified by point 2 of article 4(1) of the National Data Protection Act, according to which the processing is proportionate and necessary for the performance of a task carried out in the public interest by an authority.

### **Essential legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Protection of Privacy in Working Life (759/2004)
- Occupational Health Care Act (1383/2001)
- Workers' Compensation Act (459/2015)
- Communicable Diseases Act (1227/2016)

## **5. Data content of the register**

The patient data register holds the following basic data of the client/patient: name, client number, personal identification number, street address, home city, employment relationship, profession, phone number, work phone number and the employer's information.

Health-related information is registered and processed in the client's/patient's event file as special categories of personal data. The processing is legal based on item h of article 9(2) of the EU's General Data Protection Regulation, according to which processing is necessary for the purposes of the provision of health or social care.

These data include information related to the patient's health and illnesses, medical risks, health check-up, consultation requests and answers, statements and certifications given, laboratory results and requests (own and purchased services), imaging examinations, referrals to them and their results (own and purchased services).

External statements related to health and other examination results that cannot be directly entered into the patient information system will be scanned into the system.

The data disclosed by the client will be received through electronic service channels: first name and family name, personal identification number, e-mail address, telephone number, address and password and the user's discussions held via the service in question, as well as other data entered by the user (such as answers to various forms), which will also be entered into the patient information system to the extent applicable.

## **6. Regular disclosures of personal data**

The data in Occupational Health Helsinki's patient information register will not be disclosed without the patient's explicit written consent, excluding situations based on specific legislation (e.g. Workers' Compensation Act, Health Insurance Act and Communicable Diseases Act).

Additionally, materials can be disclosed based on a research permit to institutes such as the Finnish Institute of Occupational Health and the University of Helsinki.

Data in the patient information register will not be disclosed outside the EU/EEA.

## **7. Data storage periods**

When a patient record is generated based on personal data, it is stored in accordance with the patient record degree (298/2009).

In brief, the periods for which the personal data are stored follow these guidelines:

The patient's basic information and central information related to their treatment and care will be kept for 12 years after the patient's death, or, if the date of death is not known, for 120 years after the patient's birth. These data include: living will; summaries; entries related to the planning, implementation, follow-up or assessment of care and the records created thereof; referrals; laboratory results; physicians' B statements; decisions related to involuntary treatment or care.

The patient records to be stored permanently are the patient records and documents of hereditary medicine of people born on the 18th and 28th of each month (to be stored by public healthcare). The patient records compiled or received before 1 May 1999 or patient records for patients who died before 1 May 1999 patient records are generally kept for 100 years from birth or 20 years from death. Exceptions to the aforementioned and other periods for which personal data are stored are specified in the appendix of the patient record decree.

## **8. Sources of personal data**

City of Helsinki HR administration is responsible for personnel information systems. Base data regarding city of Helsinki employees is retrieved from these systems daily. Updating base data of the personnel working in the companies and foundations is done based on separate agreements. Information related to the client's health state will be received

directly from the patient through personal contact, via phone or electronic services and from other healthcare units, with the patient's consent.

The digital services of Occupational Health Helsinki collect user information when the user registers in the service, updates their information and uses the service (e.g. discussions, answers to forms).