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<p><b>1. Custodian</b></p>	<p><b>Name</b> Social Insurance Institution of Finland</p> <hr/> <table border="0"> <tr> <td><b>Postal address</b></td> <td><b>Postcode</b></td> <td><b>Telephone</b></td> </tr> <tr> <td>P.O. Box 450</td> <td>00056 Kela</td> <td>020 634 11</td> </tr> </table> <hr/> <p><b>Street address</b> Nordenskiöldinkatu 12, 00250 Helsinki</p>	<b>Postal address</b>	<b>Postcode</b>	<b>Telephone</b>	P.O. Box 450	00056 Kela	020 634 11
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P.O. Box 450	00056 Kela	020 634 11					
<p><b>2 Person responsible for register issues or contact person</b></p>	<p><b>Name</b> Data Protection Officer for Kanta services asiakaspalvelu@kanta.fi</p>						
<p><b>3 Name of register</b></p>	<p>Patient data management service</p>						
<p><b>4 Purpose of processing personal data / purpose of use of the register</b></p>	<p>According to section 14 a of the Act on the Electronic Processing of Client Data in Social and Health Care Services (159/2007), the Social Insurance Institution of Finland (hereinafter Kela) maintains the patient data management service and acts as its controller.</p> <p>Kela carries out the processing of personal data in accordance with the EU's general data protection regulation and other legislation regulating the processing of personal data, and by virtue of the Act on Electronic Prescriptions.</p> <p>Healthcare service providers may use the data recorded and shown in the patient data management service when organising and implementing the client's health and medical care. Clients can browse and update the data concerning consents and declarations of intent recorded in the patient data management service in the My Kanta Pages service (<a href="http://www.omakanta.fi">www.omakanta.fi</a>).</p> <p>Data concerning consents and declarations of intent recorded in the patient data management service may be utilised in scientific research, reporting and compiling of statistics under conditions provided in the law.</p> <p>Data recorded in the patient data management service concerning the patient's consents and declarations of intent shall be retained for 12 years after its creation, after which the data shall be destroyed.</p>						
<p><b>5 Data content of the register</b></p>	<p>A note about the fact that the patient has been informed of the national information system services (Kanta services, i.e. the Patient Data Repository, Prescription and My Kanta Pages) shall be recorded in the patient data management service. A note about the fact that the patient has been informed about the common register, which is a common entity of patient data registers for the municipal healthcare custodians in the area of each hospital district, shall be recorded in the service.</p> <p>The patient's consent concerning sharing of patient data, withdrawal of the consent, refusal to share patient data and the withdrawal of the refusal shall be recorded in the service. The patient's living will and their opinion on organ donation shall also be recorded in the service.</p>						

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	<p>Furthermore, data concerning the provision of information and consents with regard to electronic prescriptions of the patient shall also be recorded in the patient data management service.</p>
<p><b>6 Regular information sources</b></p>	<p>Healthcare service providers who have joined the Kanta services shall record data concerning the patient's consents and declarations of intent in the patient data management service. The patient may record their acknowledgement of receipt of information about the Kanta services and record their consent to share patient data, the withdrawal of the consent, the refusal to share patient data and the withdrawal of the refusal, as well as the refusal to share electronic prescriptions in My Kanta Pages.</p>
<p><b>7 Regular disclosure of data and transfer of data to outside the EU or the European Economic Area</b></p>	<p>Healthcare service providers may use the data recorded and shown in the patient data management service when organising and implementing the client's health and medical care. The data sharing must be based on the patient's consent, section 13 (3)(3) of the Act on the Status and Rights of Patients, or on other regulation justifying the sharing. Data for which the patient has given their refusal shall not be shown through the patient data management service.</p> <p>Sharing of data requires that the existence of a patient care relationship between the patient and the party requesting the sharing of data has been verified by means of information technology.</p> <p>Situations where data on the patient's consents and declarations of intent, the grounds for sharing the data and the method of sharing in accordance with the act on electrical processing of client data in social and health care and other legislation have been compiled in Appendix 1 at the end of this policy.</p> <p>Data shall not be transferred to outside the EU or the European Economic Area.</p>
<p><b>8 Principles of protection of the register</b></p>	<p>The data recorded in the patient data management service is confidential data concerning the person's health and medical care.</p> <p><b>Organisational protection principles</b></p> <p>The responsible director of the healthcare service provider shall provide written instructions on the processing of data and take care of sufficient expertise and competence of his/her staff when processing patient data.</p> <p>The healthcare service provider and Kela for its own part shall monitor and supervise that the data protection and data security related to the service it provides are realised. The healthcare service provider and Kela have appointed a Data Protection Officer for the monitoring and supervision task.</p> <p><b>Technical protection principles</b></p> <p>Browsing, recording and other processing of data in the patient data management system and accessible via the system require strong authentication that identifies the processor, as well as access rights management related to the system by both the healthcare service provider and Kela.</p>

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	<p>The Population Register Centre is responsible for the identification and certification services for the Kanta services.</p> <p>The healthcare service provider and Kela are responsible for the management of access rights for their own parts.</p> <p>Log data is recorded in the log of the patient data management service with regard to all browsing and processing of data in the patient data management service.</p> <p><b>Physical protection principles</b></p> <p>The data recorded in the patient data management service is technically protected against editing and deleting.</p> <p>Kela's IT areas and the physical location of data are in Finland. Kela's technical maintenance staff have restricted access to the IT areas when the management of their duties requires access to these areas.</p>
<p><b>9 Access to the data</b></p>	<p>The patient is entitled to inspect their personal data recorded in the patient data management service. The request can be submitted on the inspection request form, which is available from healthcare units that have joined the Kanta services and from Kela's offices. The request to inspect the data recorded in the patient data management service shall be sent to Kela (Registry, P.O. Box 450, 00056 Kela). The request can be made by telephone or by sending an email to Kela's Registry (kirjaamo@kela.fi). As a rule, the respond to the inspection request is sent free of charge.</p>
<p><b>10 Right to request rectification of data</b></p>	<p>The patient is entitled to request rectification of incorrect data that has been recorded in the patient data management system. If the patient or their legal representative requests rectification of an error or the incorrect data is based on an entry made by a healthcare service provider, the request for rectification must be addressed to the healthcare service provider that made the incorrect entry.</p> <p>In other cases, the request for rectification shall be sent in writing to Kela (Registry, P.O. Box 450, 00056 Kela). If it is not possible to agree to the request for rectification, Kela shall issue a certificate of refusal to the patient. The reasons why the request by the patient or their legal representative was not accepted shall be stated in the certificate of refusal. After receiving the certificate of refusal, the patient may still refer the matter to be dealt with by the competent regulatory authority.</p>
<p><b>11 Right to lodge a complaint to the regulatory authority</b></p>	<p>If the patient deems that the processing of their personal data has breached the applicable data protection regulations (Articles 12–22 of the EU's general data protection regulation), the patient is entitled to lodge a complaint to the competent regulatory authority. In Finland, the regulatory authority is the Data Protection Ombudsman.</p>
<p><b>12 Other rights related to the processing of personal data</b></p>	<p>The patient is entitled to learn who has had access to their personal data recorded in the patient data management service by submitting a log data request</p>

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to Kela. In addition, the patient is also entitled to be informed about the sharing of data that is accessed via the patient data management service.

The log data request can be submitted on the log data request form, which is available from healthcare units that have joined the Kanta services and from Kela's offices. The log data request shall be sent to Kela (Registry, P.O. Box 450, 00056 Kela). The request can be made by telephone or by sending an email to Kela's Registry ([kirjaamo@kela.fi](mailto:kirjaamo@kela.fi)). As a rule, the respond to the log data request is sent free of charge.

There is no right to obtain log data that is older than two years without a valid reason. The patient must not use or share the log data they have received for any other purpose.

If the patient considers on the basis of the log data that their information has been processed without a valid reason, they can request the pharmacy or healthcare unit in question for an explanation of the matter.

The patient is entitled to receive the same data again if there is a valid reason for it in order to fulfil the patient's interests and rights. Kela may charge a fee corresponding to the costs of providing the information with regard to information that is provided a second time.

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## Appendix 1

### Sharing of data in the patient data management system with the authorities and other actors

According to section 16.5 of the act on electrical processing of client data in social and health care, Kela may share the data in the patient data management service according to the criteria on the patient's declarations of intent as laid down in section 13 (2–5) of the Act on the Status and Rights of Patients. The data is provided in writing.

Kela may share the data concerning the patient's declarations of intent in the patient data management service in accordance with the Act on the Openness of Government Activities (section 16.5 of the act on electrical processing of client data in social and health care 250/2014 and sections 13.2–13.5 of the Act on the Status and Rights of Patients 785/1992) for the purpose of scientific research. The decision to share this data shall be taken by Kela.

### Browsing the data in the patient data management service via the citizen's My Kanta Pages

According to section 19 of the act on electrical processing of client data in social and health care and section 17 of the Act on Electronic Prescriptions, the patient shall receive information about their consents, refusals, share log data, and information about the patient's organ donation testament and living will recorded in the patient data management service with the aid of the My Kanta Pages service.

The personal data of a donor and transplant recipient or the share log data that the patient does not have a right to receive by virtue of section 16(3) of the Act on Electronic Prescriptions shall not be shared with the patient on My Kanta Pages.

Logging in to My Kanta Pages takes place with the patient's personal banking codes, electronic ID card or mobile certificate on the Kanta website ([www.kanta.fi](http://www.kanta.fi)).