

Data Protection Notice for Wellbeing Team's Care of Needs Assessment Service

1. Introduction

This Data Protection Notice describes how personal data is processed in the wellbeing team's Care Needs Assessment service. It also explains the rights of data subjects and how those rights may be exercised.

The Care Needs Assessment forms a part of the service provided by the Wellbeing Team to employees of the employer purchasing the service. The employer acts as the data controller in matters such as assessing an employee's work ability and processing absence notifications. Luona Hoiva Oy acts as the data controller of the personal data processed in connection with the Care Needs Assessment, as the service constitutes a healthcare service. The service is subject to the legislation governing healthcare services, including the Act on the Status and Rights of Patients (785/1992) and the Act on the Processing of Client Data in Healthcare and Social Welfare (703/2023).

This Data Protection Notice is updated regularly. The latest version is always available at www.luona.fi/tietosuojaselosteet.

2. Data Controller and Data Protection Officer

Data Controller

Luona Hoiva Oy

Mannerheimintie 113, 00280 Helsinki

Data Protection Officer

Lauri Huhtanen, lauri.huhtanen@bravedo.fi or tietosuoja@luona.fi

3. Purposes of Processing, Data Types, Legal Bases and Retention Times

Purpose of Processing	Data Types	Legal Basis	Retention Time
Remote Care Needs Assessment service	Name, personal identity number, phone number, and health information provided by the data subject and, where necessary, retrieved from the Kanta services	Legal Obligation	3 months from data collection
Recording patient information in the Kanta services	Name, personal identity number, phone number, and health information relating to the Care Needs Assessment	Legal Obligation	Regulatory retention times, 12 years after the patient's death or 120 years after the patient's birth

Recording phone calls for quality assurance and the handling of complaints	Name, phone number, and any personal data disclosed during the call	Legitimate interest in ensuring the quality of the service and handling any complaints	Phone number is retained for 2 years from the date of the call Call recordings are retained for 3 months from the date of the call
--	---	--	---

4. Data Sources

Personal data required for the Care Needs Assessment is collected directly from the data subject during the phone call. The data subject is referred to the Care Needs Assessment through the Wellbeing Team, from which the data subject's name and phone number are obtained. Where the Care Needs Assessment requires the processing of the data subject's previous patient information, patient records stored in the Kanta services may be retrieved through the Kanta Patient Data Repository.

5. Data Disclosures and Transfers

Patient data processed in connection with the Care Needs Assessment is confidential by law and is not disclosed to the service purchaser or any other third parties. Patient records are stored in the Kanta Services in accordance with regulatory requirements (Act on the Processing of Client Data in Healthcare and Social Welfare (703/2023)).

Personal data may be disclosed to a public authority, such as the police, on a case-by-case basis where there is a legal obligation for disclosing the data.

The provision of the service involves the use of external service providers, such as suppliers of the patient information system and phone call service. These service providers act as processors on behalf of the data controller. All service providers are contractually bound to comply with applicable data protection legislation and to ensure the confidentiality of the personal data they process. Personal data is processed exclusively within the EU/EEA.

6. Data Subject Rights

Exercising Data Subject Rights

Rekisteröidyllle kuuluu monia oikeuksia, joiden avulla he voivat vaikuttaa henkilötietojensa käsittelyyn. Alla mainittuja oikeuksia voi käyttää lähettämällä asiaa koskevan pyynnön sähköpostitse osoitteeseen tietosuoja@luona.fi. Rekisteröidyn henkilöllisyys vahvistetaan ennen oikeuksien toteuttamista pyynnön oikeellisuuden varmistamiseksi.

Data subjects have a number of rights that enable them to influence how their personal data is processed. The rights below may be exercised by submitting a request by email to tietosuoja@luona.fi. Before any request is fulfilled, the identity of the data subject will be verified to ensure that the request is made by the correct person.

Right to Be Informed

Data subjects have the right to receive information about the processing of their personal data in a transparent, easily accessible and understandable form. This Data Protection Notice provides the key information about our processing of personal data. If you have any questions

regarding the processing of your personal data, you may contact us using the contact details provided at the beginning of this Data Protection Notice.

Right of Access

Data subjects have the right to obtain confirmation as to whether we process personal data relating to them and, where that is the case, to receive a copy of such personal data.

Right to Rectification

Data subjects have the right to request the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

Right to Restrict Processing

Data subjects have the right to request the restriction of the processing of their personal data. Where processing is restricted, the personal data may, with the exception of storage, only be processed with the data subject's consent, for the establishment, exercise or defence of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or a Member State. This right applies, for example, where the accuracy or lawfulness of the processing is contested. In such cases, processing will be restricted until the matter has been resolved.

Right to Object

Data subjects have the right to object, on grounds relating to their particular situation, to the processing of their personal data where the legal basis for processing is legitimate interests, the performance of a task carried out in the public interest, or the exercise of official authority. In such cases, processing will cease unless there are compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject.

Right to Data Portability

Data subjects have the right to request that their personal data be transferred from one system to another. This right applies where the personal data has been provided directly by the data subject and the processing is based on consent or on a contract.

Right to Erasure

Data subjects have the right to request the erasure of their personal data (the "right to be forgotten"). This right applies, for example, where the data subject withdraws their consent and there is no other legal basis for the processing.

Right to Lodge a Complaint

Data subjects have the right to lodge a complaint with the competent supervisory authority if they consider that the processing of their personal data infringes applicable data protection legislation. In Finland, the competent supervisory authority is the Office of the Data Protection Ombudsman.