



Privacy policy

EU General Data Protection Regulation (2016/679)

7 September 2022

## **Customer data file for healthcare service needs assessment**

### **1. Controller**

City of Helsinki, Social Services and Health Care Committee. The controller duties have been delegated to the Executive Director of Social Services and Health Care Division (Decision by the Social Services and Health Care Committee, 26 February 2019, Section 32).

Contact information:

Social Services and Health Care Division

Toinen linja 4 A

P.O. Box 6000

00099 CITY OF HELSINKI

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

**Title**

Executive Director of the Social Services and Health Care Division

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

Project Specialist Niina Vesa

Toinen linja 4 A, 9th floor, Hki 53

FI-00099 City of Helsinki

email: niina-marika.vesa@hel.fi

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

### **Purposes of the processing**

The purpose of processing personal data is to assess and investigate customers' service needs.

The data will also be used in reporting to determine how customers have been grouped to various customer relationship paths. All reporting will be done without the customer's identification information.

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

For the part of the service needs assessment, the processing is based on the customer's explicit consent (Articles 6(1)(a) and 9(2)(a) of the EU General Data Protection Regulation) and for the part of recording the data in the patient and customer information system, compliance with a legal obligation to which the Controller is subject and performance of a task in the public interest (Articles 6(1)(c) and 6(1)(e) of the EU General Data Protection Regulation).

### **Essential legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Electronic Processing of Client Data in Healthcare and Social Welfare (784/2021)
- Decree of the Ministry of Social Affairs and Health on Patient Documents (94/2022)

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

- Name
- Date of birth
- Sex/gender
- Municipality of residence
- Region
- Responses to Suuntima questions
- Final score of the survey result and the customer relationship recommended based on the score
- Customer relationship path (segmenting information)

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

Data will not be disclosed outside the EU or EEA.

## **7. Data storage periods**

Data will be stored in the system used for service needs assessment (Suuntima) for two years.

Data entered in the patient information system regarding the customer relationship path (segmenting data) will be stored in accordance with the Patient Data Register:

The storage periods of patient documents are specified in the appendix of the Decree of the Ministry of Social Affairs and Health on Patient Documents (298/2009). As a rule, patient documents are stored for 12 years after the patient's death, or if there is no information of it, for 120 years after the patient's birth. Such documents include the patient's basic information and documents containing essential medical history, documents expressing the patient's will, summaries, entries related to treatment planning, implementation, monitoring and assessment and documents made of such entries, referrals, treatment feedback and consultation documents, doctor's statements and certificates, and decisions related to starting treatment and treatment. Patient documents

accumulated before 1 May 1999 or regarding patients who passed away before 1 May 1999 are stored as a rule for 100 years after the patients' birth or 20 years after their death. Public healthcare documents of patients born on the 18th and 28th days of the month as well as documents generated in the research and treatment by hereditary medical units are stored permanently.

Exceptions to the aforementioned storage periods and other storage times are indicated in the appendix of the Patient Document Decree.

For the part of financial management's receipt data, the storage period is as a rule 10 years after the end of the financial period.

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

Personal data is collected from the data subject and the social or healthcare professional who helps the customer fill in the Suuntima data.

## **9. Automated decision-making and profiling**

Data subject's information is processed in Suuntima with the means of automated data processing to segment customers in order to define customer relationship paths, which is to be considered as profiling in accordance with Article 22 of the EU General Data Protection Regulation. The purpose of this profiling is to define the customer relationship path that is best suited for the customer. This segmenting is based on the customer's and social or healthcare professional's responses to Suuntima questions. The profiling is based on the customer's explicit consent. The Suuntima service does not employ any automated decision-making.