



Privacy policy

In accordance with the EU General Data Protection Regulation (2016/679)

Companies

Kognitiivinen käyttäytymisterapiakeskus Arvo Oy (2646894-7)
Kognitiivinen käyttäytymisterapiakeskus Arvo Salo Oy (2704942-9)
Kognitiivinen käyttäytymisterapiakeskus Arvo Tampere Oy (2704966-4)
Kognitiivinen käyttäytymisterapiakeskus Arvo Helsinki Oy (2876373-9)
Kognitiivinen käyttäytymisterapiakeskus Arvo Vaasa Oy (3100725-6)
(Hereinafter referred to collectively as Arvo)

Arvo serves as controller also for private traders and companies, which operate on Arvo premises and have signed an agreement with Arvo.

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Purpose and legal basis of the register

We collect your personal data in order to:

- manage the client relationship
- maintain contact
- plan, provide and monitor health care or preventive care
- facilitate the legal processing of data storage and administration
- provide information required by the Social Insurance Institution of Finland (Kela) and other authorities as well as provide information required by the insurance company upon your consent
- address feedback, official requests for clarification and patient safety incidents

The data subjects are current and potential future clients of Arvo or the clients and potential future clients of private traders operating on Arvo premises to the extent that Arvo serves as the controller for private traders.

The processing of data is primarily based on the client relationship, consent, commission or other relevant connection.

Data to be collected in the register

The following data may be entered in the register:

- personal data
 - o name
 - o personal identity code
 - o client number
 - o address
 - o telephone number
 - o email address
- invoicing information
- consent and prohibition of data disclosure
- data disclosed in email correspondence (email is only used for administrative matters, not in confidential correspondence and only with your consent)
- reception dates
- patient records, referrals, statements, form data and test results
- feedback, official requests for clarification and patient safety incidents

Processing of register data

Register data is processed by a health care professional or expert and administrative employees authorised by Arvo in accordance with the Health Care Act and your express consent or prohibition. The health care professional or expert providing care processes data based on the care relationship, and an administrative employee of Arvo processes data upon the request of the health care professional or expert. Personal data is stored in the



Diarium patient data and invoicing programme, whereupon the data is transferred to Finnish Net Solutions Oy (hereinafter referred to as FNS), which serves as the processor of personal data. FNS is responsible for ensuring that personal data is processed using the appropriate data protection processes in accordance with applicable legislation and Arvo guidelines. In addition, required data shall be disclosed to partners for invoicing purposes.

Within the scope of your consent and prohibition and in accordance with the Act on the Status and Rights of Patients, register data may also be disclosed to another health care unit or health care professional, insurance company, authority, community, close relative or other legally entitled person close to the patient (section 13 of the Act on the Status and Rights of Patients, 785/1992). Your data in the health care register is archived in the Kanta Patient Data Repository, which is administered by Kela, in a manner required by law for the period of time after registering with Arvo's Kanta services. Your data stored in the Patient Data Repository may also be disclosed through Kanta services based on your consent. (Act on the Electronic Processing of Client Data in Healthcare and Social Welfare, 159/2007).

Data may not be disclosed or transferred outside the European Union or European Economic Area.

Generating the register

The register is generated: from the data you disclose when making an agreement on the start of treatment; on the basis of the personal data form you filled out; when you contact us via email; and when Arvo or a private trader contacts you via email. Data is also generated by a professional in connection with treatment or when receiving information from other health care units and health care professionals (e.g. based on a referral or outsourcing agreement) as well as from insurance companies.

Data protection

In its operations, Arvo has planned and implemented the appropriate technical and organisational measures for ensuring the security of personal data and protecting data when processing personal data. At Arvo, data protection and privacy measures include: storing only the data required by law and necessary to ensuring the best possible care; restricting the processing of data with regularly changed passwords; providing data protection and privacy training to employees and private traders operating on Arvo's premises; using firewalls and encrypted Internet connections and thumb drives; and using locking filing cabinets when storing personal data that is not in electronic form. Arvo also provides training in data protection and privacy to its employees and private traders operating under an agreement with Arvo as well as restricts access to its premises from unauthorised persons.

Right to your own data

You have the right to your own data (right of access) as well as the right to transfer any data you provide to another register in a manner specified by laws and decrees (right to data portability). You may obtain your data by contacting the treating health care professional or expert, who shall provide the requested data according to how the matter



is specified in laws and decrees. The right of inspection may also be refused on legal grounds. After registering with Kanta, other health care operators may access your data in the Patient Data Repository with your consent.

Right to be forgotten

Your right to be forgotten is handled in accordance with applicable health care legislation. If desired, you may erase the data you have provided by contacting the treating health care professional or expert, who shall erase your data within the scope of applicable law.

Right to withdraw consent

If the storing of your data is based on consent, we shall recognise the withdrawal of your consent within the scope of applicable law. You may withdraw your consent by contacting the treating health care professional or expert.

Right to restrict processing

If desired, you may restrict the use of your personal data by contesting its accuracy for the period of time during which its accuracy can be verified.

Right to rectification

We shall rectify any inaccurate or incorrect personal data upon receiving a notification from you, provided that there is cause to do so. When rectifying data, contact the treating health care professional or expert, who shall take the necessary measures.

Right to lodge a complaint with the Data Protection Ombudsman

If you believe that your data has been misused in violation of the General Data Protection regulation, you shall first contact our data protection officer. If you are not satisfied with our response, you have the right to contact the Data Protection Ombudsman regarding the matter.

Retention of your data

In accordance with the Decree of the Ministry of Social Affairs and Health on Patient Documents (298/2009), your health data shall be retained, as a rule, for 12 years after your death or 120 years from your date of birth. Your other data shall be retained for the period of time specified by law or for as long as it is necessary to the client relationship.