

1. Name of the register	Clinical physiology register ( <i>Kliinisen fysiologian rekisteri</i> )
2. Data controller	Fimlab Laboratoriot Oy PO Box 66 33013 Fimlab
3. Contact person in register-related matters and Data Protection Officer appointed by the organisation	Merja Maijala Data Protection Officer tel.: +358 3 311 75259 email: tietosuoja@fimlab.fi
4. Purpose of and legal basis for processing personal data	<p>The basis for the processing of personal data in the clinical physiology register is, on a case-by-case basis, either the delivery of an agreement concluded with the customer, compliance with the data controller's statutory obligations, the customer's consent or pursuit of legitimate interests in order to develop Fimlab's operations.</p> <p>Fimlab Laboratoriot uses the register for the following purposes:</p> <ul style="list-style-type: none"> <li>• Electronic storage, archiving and review of the patient's ECG recordings</li> <li>• Provision, archiving and review of ambulatory ECG recordings</li> <li>• Provision, archiving and review of flow-volume spirometry tests</li> <li>• Provision, archiving and review of cardiac stress tests</li> <li>• Treatment of the patient</li> <li>• Scientific research</li> <li>• Compilation of statistics and reporting on operations</li> <li>• Monitoring and development of the organisation's operations and processes</li> <li>• Execution of laws and regulations on private health care activities</li> </ul> <p>The logical personal data register contains the following sub-registers with their respective privacy policies:</p> <ul style="list-style-type: none"> <li>• Flow-volume spirometry</li> <li>• Long-term ECG recording (Home Holter, Laboratory Holter, Stress test)</li> <li>• Resting ECG recording (MUSE system)</li> </ul> <p>Fimlab acts as the data controller for various client organisations, with regard to laboratory operations, pursuant to its agreements with these organisations. Fimlab also has private patients (who pay for their tests themselves) as customers.</p>

<b>5. Data content of the register</b>	<p>The following personal data may be collected of the data subject:</p> <ul style="list-style-type: none"> <li>• Patient's name, social security number and public contact details</li> <li>• Sample number</li> <li>• Information related to the recording, e.g. place and time of recording and the sampler</li> <li>• Other test-related preliminary information includes medication, height, weight and smoking</li> </ul> <p>A detailed list of the personal data stored in the register may be requested from the Data Protection Officer (tietosuoja@fimlab.fi).</p>
<b>6. Regular sources of data</b>	<p>The data in the personal data register is obtained from the referral from the sending health care treatment unit and directly from the patient or their representative in connection with the examination. Data is also obtained from the laboratory information system Tamlab, ECG recording equipment, stress test equipment, Holter monitors and spirometry equipment and their middleware.</p>
<b>7. Recipients of data</b>	<p>According to a scientific research agreement based on the customer's consent or the data controller's or Findata's permission, data may be disclosed to scientific research groups.</p> <p>The client organisation's physicians have a technical viewing access to another organisation's ECG recordings with the patient's explicit consent recorded in the viewing system. The patient may withdraw their consent.</p>
<b>8. Transfer of data outside the EU or EEA</b>	<p>In principle, personal data in the register is not transferred outside the EU or EEA.</p>
<b>9. Retention period</b>	<p>The data collected in the register is stored only for as long as and to the extent necessary for the original or appropriate purposes for which the personal data was collected. Personal data referred to in this privacy policy is stored for as long as the data controller uses it for the purposes specified in section 4. Personal data stored in the register is erased when the legal basis for its processing ceases to apply.</p>
<b>10. Principles of protection</b>	<p>Appropriate technical and organisational measures have been taken to ensure the information security of the register and the confidentiality, integrity and accessibility of the personal data</p>

	<p>collected.</p> <p>Manual material is stored in an archive and in laboratory facilities controlled with access control and/or a locking system. Electronic material is protected securely so that it can only be accessed from the organisation's intranet. The access rights to the organisation's information systems and files are based on personal access rights, the use of which is controlled.</p> <p>Databases are maintained by the IT service provider. Fimlab Laboratoriot Oy's guidelines on data security and data privacy are observed in the storage of data.</p>
<b>11. Right to access and rectify data (Article 15 and 16)</b>	<p>The data subject shall have the right to know which of their personal data have been stored in the register. The request to access data or have data rectified is submitted by sending a written request to the Data Protection Officer (tietosuoja@fimlab.fi). After submitting their request, the data subject must identify themselves at the data controller's service point in order to verify the identity of the applicant in accordance with the data controller's instructions or, alternatively, the data controller may require the data subject to provide any necessary additional information to verify the applicant's identity due to the delicacy of the data requested.</p>
<b>12. Right to erasure (Article 17)</b>	<p>The data subject shall have the right to obtain from the controller the erasure of personal data concerning them without undue delay if</p> <ul style="list-style-type: none"> <li>the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;</li> <li>the data subject withdraws their consent on which the processing is based, and where there is no other legal ground for the processing;</li> <li>the personal data has been unlawfully processed; or</li> <li>the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.</li> </ul> <p>The request to have data erased is submitted by sending a written request to the Data Protection Officer (tietosuoja@fimlab.fi). After submitting their request, the data subject must identify themselves at the data controller's service point in order to verify the identity of the applicant in accordance with the data controller's instructions or, alternatively, the data controller may require the data subject to provide any necessary additional information to verify the applicant's identity due to the delicacy of the data requested.</p> <p>Despite the request to have data erased, the data controller may be entitled to continue the processing personal data stored in the register based on a legal reason under Article 17(3) of the General Data Protection Regulation.</p>

<p><b>13. Right to restriction of processing (Article 18)</b></p>	<p>The data subject shall have the right to obtain from the controller restriction of processing if</p> <ul style="list-style-type: none"> <li>• the accuracy of the personal data is contested by the data subject;</li> <li>• the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;</li> <li>• the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims.</li> </ul> <p>The request to restrict the processing of data is submitted by sending a written request to the Data Protection Officer (tietosuoja@fimlab.fi). After submitting their request, the data subject must identify themselves at the data controller's service point in order to verify the identity of the applicant in accordance with the data controller's instructions or, alternatively, the data controller may require the data subject to provide any necessary additional information to verify the applicant's identity due to the delicacy of the data requested.</p>
<p><b>14. Right to withdraw consent (Article 7)</b></p>	<p>The data subject shall have the right to withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p>
<p><b>15. Right to data portability (Article 20)</b></p>	<p>The data subject shall have the right to receive the personal data concerning them, which they have provided to the data controller in a structured, commonly used and machine-readable format, and have the right to transmit this data to another controller, if possible. This right shall apply to personal data that has been processed automatically and based on consent or for the purpose of implementing an agreement. After submitting their request, the data subject must identify themselves at the data controller's service point in order to verify the identity of the applicant in accordance with the data controller's instructions or, alternatively, the data controller may require the data subject to provide any necessary additional information to verify the applicant's identity due to the delicacy of the data requested.</p>
<p><b>16. Right to lodge a complaint with a supervisory authority (Article 77)</b></p>	<p>The data subject shall have the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to them infringes the General Data Protection Regulation.</p>