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Privacy policy for the TEHDAS stakeholder open call

1 Controller

Controller of the register:

Sitra, the Finnish Innovation Fund (business ID 0202132-3)

Contact person in matters concerning the register:

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2 Name of the register

TEHDAS stakeholder open call

3 Purpose of personal data processing

The Joint Action Towards the European Health Data Space (TEHDAS) is inviting stakeholders to join the project. TEHDAS has opened a stakeholder open call to involve the stakeholders from Europe in the project. Sitra shall process personal data for the purposes of selecting experts for the group or forum and arrangements concerning events, workshops and meetings.

Sitra shall also process personal data in connection with other communication targeted at interest groups and collaboration partners, such as surveys, informing and reporting (e.g. newsletters), calls for ideas, as well as providing information on them and marketing them to the target audience.

4 Legal basis for personal data processing

Sitra processes personal data based on consent.

5 Data content of the register (processed personal data categories)

The register contains the following personal data about stakeholders. The data in section (a) to (d) are collected about all data subjects and the data in sections (e) to (g) are collected when necessary.

- (a) The person's (data subject's) basic data, such as name, telephone number, e-mail address,
- (b) Data on the person's (data subject's) work and position, such as title, education, place of work (organisation) and job title,
- (c) Data on the person's (data subject's) professional knowledge, skills and networks,
- (d) Data on the person's (data subject's) consents to the data processing,
- (e) Direct marketing permissions and prohibitions expressed by the person (data subject).
- (f) Data related to communication between the data subject and Sitra, such as subscriptions to newsletters and other lists, registration for and participation in events and meetings, as well as any correspondence that may be necessary for maintaining the interest group relationship.

In addition to the above-mentioned personal data, the register may contain the following personal data on persons (data subjects) who use Sitra's information systems that require identification.

- (g) Transactions in electronic information systems for a restricted period of time (opened page/file, time stamp, user ID and IP address).

6 Regular data sources

Personal data shall be collected from the **data subject**.

7 Personal data retention period

The collected data shall be retained only for the duration and to the extent necessary for the original or compatible purposes for which the data was compiled.

In addition, the data listed below shall be retained as per the following retention periods.

- (a) The basic data on the data subjects contained by the register shall be retained as long as is necessary for approval of the experts for the group or forum.
- (b) Stakeholders' (data subjects') personal data related to the organisation of a meeting or other similar occasion organised by Sitra shall be retained for the duration project. The data on participants of meetings organised by Sitra are archived.

Sitra shall regularly assess the need to retain the data as per the internal Code of Conduct. Furthermore, Sitra shall perform all possible and required measures to ensure that such personal data that are inaccurate, erroneous or outdated for the purposes of processing are deleted or corrected without delay.

8 Recipients of personal data (recipient categories) and the regular disclosure of data

The personal data contained in the register shall be disclosed to third persons or organisations as follows.

Disclosing personal data to TEHDAS Competent Authorities (26). In TEHDAS joint action there are three types of Competent Authorities: 14 countries are represented by their ministry of health, 8 countries by their national health institutions and the rest by either regional agencies or other type of public bodies. Personal data may be disclosed for the purpose of reviewing and selecting the stakeholders, communication purposes and for work related to different Forums and Groups during TEHDAS Joint Action.

Bunderministerium für Arbeit, Soziales, Gesundheit und Konsumentenschutz (ATNA), Austria

Sciensano, Belgium

Ministerstvo na Zdraveopazvaneto (MoH-BG), Bulgaria

Hrvatski Zavod za Zdravstveno Osiguranje HZZO (CHIF), Croatia

Ministry of Health of the Republic of Cyprus (MoH-CY), Cyprus

Ministerstvo Zdravotnictvi Ceske Republiky (MZCR), Czech Republic

Region Midtjylland (RM), Denmark

Sotsiaalministeerium - Estonian Ministry of Social Affairs (MoSA), Estonia

Plateforme des données de santé (FR-HDH), France

Bundesministerium für Gesundheit (BMG), Germany

Dioikisi 6is Ygeionomikis Perifereias Peloponnissou Ionion Nyson Ipeirou Kai Dytikis Elladas (6th Y. PE.), Greece

OKFŐ Országos Kórház Főigazgatóságba, National Healthcare Service Center (AEEK), Hungary

Department of Health (DoH-IE), Ireland

Ministero Della Salute (MINSAL), Italy

Lietuvos Respublikos Sveikatos Apsaugos Ministerija (SAM-LT), Lithuania

Ministry for Health - Government of Malta (DHIR), Malta

Agentia de Transplant (ATRM), Moldova

Ministerie van Volksgezondheit, Welzijn en Sport (VWS), Netherlands

The Norwegian Ministry of Health and Care Services (MoH-NO), Norway

Servicos Partilhados do Ministerio da Saude Epe (SPMS), Portugal

Institut za Zastitu Zdravlja Srbijedr Milan Jovanovic Batut (IPHS "Batut"), Serbia

Nacionalni Institut za Javno Zdravje (NIJZ), Slovenia

Instituto Aragonés de Ciencias de la Salud (IACS), Spain

E-Halsomyndigheten (SEHA), Sweden

NHS Confederation (NHSC), United Kingdom

9 Transferring data outside of the EU or the EEA

The data contained in the register may be transferred outside of the EU or the EEA. When transferring personal data, Sitra observes the model contract clauses approved by the European Commission concerning the transfer of personal data to third countries, implements other appropriate protection measures as necessary or ensures that the adequate level of data protection is guaranteed in the third country.

10 Register protection principles

Any physical data material containing personal data shall be retained in a locked facility that can only be accessed by appointed persons whose duties require access authority.

The databases containing personal data are on servers which are kept in locked facilities that can only be accessed by appointed persons whose duties require access authority. The servers are protected by an appropriate firewall and technical protection.

The databases and systems can only be accessed with separately granted personal user IDs and passwords. Sitra has restricted the access rights and the authorisations to access the data systems and other mediums in such a way that the data can only be accessed and processed by persons who are needed with regard to lawful processing. In addition, the database and system transactions are registered in the logs of Sitra's IT systems.

Sitra's employees and other personnel have undertaken to comply with the obligation of secrecy and to keep confidential the information they receive in connection with the personal data processing.

11 Rights of the data subject

The data subject shall have the following rights laid down in the EU's General Data Protection Regulation.

(a) The right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

(i) the purposes of the processing;

(ii) the categories of personal data concerned;

(iii) the recipients or recipient groups to whom personal data have been disclosed or will be disclosed;

(iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

(v) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

(vi) the right to lodge a complaint with a supervisory authority;

(vii) where the personal data are not collected from the data subject, any available information as to their source;

(viii) the existence of automatic decision-making and relevant information about the logic related to such processing, as well as the relevance of this processing and its possible consequences for the data subject.

(b) The right to cancel consent at any time without this affecting the lawfulness of the processing performed on the basis of the consent.

(c) The right to demand that the controller rectify without undue delay any inaccurate and erroneous personal data on the data subject and the right to have incomplete personal data completed.

(d) The right to obtain from the controller the erasure of the personal data concerning the data subject without undue delay in situations determined in the EU's General Data Protection Regulation.

(e) The right to obtain from the controller restriction of processing in situations determined in the EU's General Data Protection Regulation.

(f) The right to receive the personal data concerning him or her, which the data subject has provided to Sitra, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, if the processing is based on the consent referred to in the Regulation and the processing is carried out automatically.

(g) The right to file a complaint with the supervisory authority if the data subject considers that the processing of the personal data concerning him or her violates the EU's General Data Protection Regulation.

Requests concerning the realization of the data subject's rights shall be addressed to Sitra's contact person mentioned in Section 1.

12 Making changes to the privacy policy

We reserve the right to alter this privacy policy by notifying of any changes on our website. The changes may be based on changes in legislation and other similar reasons. We recommend that you read the content of the privacy policy regularly.