

Privacy Statement for the Processing of Customer Data at HealthHub Finland EDIH

HealthHub Finland EDIH partner organizations process personal data only for a predetermined purpose, and only for as long as the processing is necessary for the intended purpose. HealthHub Finland EDIH organizations personnel process your data for the joint registry (Business Tampere, FINBB, Kuopio Health, Business Oulu, Turku Science Park Oy, University of Oulu, Varha – The wellbeing services county of Southwest Finland, Kajaani University of Applied Sciences).

This notice sets out how we process your personal data for HealthHub Finland EDIH.

HealthHub Finland is a one-stop-shop for the development of digital solutions for health and wellbeing, and a gateway to Finnish health and wellbeing data. HealthHub Finland is part of the EDIH Network, a pan-European partnership of over 200 European Digital Innovation Hubs. EDIHs function as service points that boost digital investment and, in particular, the digitalisation of SMEs. The initiative is co-funded by the European Commission’s Digital Europe Programme and Business Finland, the Finnish government organization for innovation funding and trade, travel and investment promotion. <https://healthhubfinland.eu/>

<p>Purpose for the processing of personal data</p>	<p>The purpose for the processing of personal data is to manage the customer and collaboration relationships HealthHub Finland EDIH, project management and project activities, providing and developing services, organizing events, and communicating about and marketing the services. In addition, personal data is processed for legal commitments, reporting to our funding organizations (European Commission (later EC), Business Finland).</p> <p>Personal data is processed also for the following purposes:</p> <ul style="list-style-type: none"> • customer and stakeholder relationship management and other customer communications, such as marketing, newsletters, customer surveys, maintenance of customer contact information and invoicing • the registrar in connection with the provision of expert and customer services services and assignments • for contacting potential customers • education for work-life cooperation and the implementation of research, development and innovation activities, such as the implementation of cooperation projects • for the planning and development of the registrar's operations and services • for the implementation and management of services (e.g. events and trainings) and assignments, including the processing of service requests, for communicating with customers, sharing participant lists at training events and managing access rights in the data controller's information systems • for interest group cooperation, such as maintaining the areas of expertise of persons acting in the role of lecturer and registering implementations and paying the invoices and fees of interest groups • to provide the contact information of participants in the training/event to other stakeholders participating in the event for marketing purposes
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	<ul style="list-style-type: none"> • for access control and video surveillance purposes • to fulfill the statutory or contractual monitoring, reporting and statistics obligation
<p>Legal grounds for the processing of personal data</p>	<ul style="list-style-type: none"> • Data subject's consent • Compliance with the legal obligation(s) of the controller • Legitimate interests of the controller <p>HealthHub Finland EDIH operation has legitimate interest to manage customer relationships by offering services for companies, entrepreneurs and other organizations, and to organize events either directly or in cooperation with other parties. Personal data is only processed to the extent necessary for the purposes and in a way the data subjects can reasonably expect when disclosing their data. HealthHub Finland EDIH is under legal obligation and agreement with its funders (EC, Business Finland) to report about its operations and customers. Consent of the data subject is needed by HealthHub Finland EDIH to be able to provide its services.</p> <p>The processing of personal data is also based on the controller's authorization benefit (e.g. customer relationship management, ensuring legal protection, marketing, invoicing, payment of fees, distribution of event participant list, disclosure of contact information to stakeholders for marketing purposes) or to the agreement (e.g. registering for training) or to a legal obligation (e.g. accounting obligations related to the storage of invoicing transactions). In addition, consent may be requested from the registrants if necessary.</p> <p>In cases of collaboration related to teaching and research, development and innovation activities, data processing is based on the statutory tasks of the university of applied sciences (University of Applied Sciences Act 932/2014).</p> <p>Special considerations related to the registrar's trainings/events:</p> <p>The registration information can be used in the arrangements of the event in question and the names of the registered participants can be shared in the participant list. The occasions may be filmed. The purpose of filming is to enable participation in trainings via a remote connection or to use recordings/images for training or for marketing purposes.</p> <p>HealthHub Finland EDIH can also use external personal data processors, such as companies offering Customer Relationship Management system services, which process personal data for HealthHub Finland EDIH account based on the commission agreement.</p>
<p>What kind of categories of personal data will be collected?</p>	<p>The customer and stakeholder register is maintained</p> <ul style="list-style-type: none"> • Contact information of persons who have used HealthHub Finland EDIH's services and the organizations they represent • HealthHub Finland EDIH's contract customers and persons acting as their representatives contact information • Contractual information and other related forms

- contact information of potential customers
- persons who have given their marketing consent in another way and contact information of the organizations they represent
- stakeholder contact information
- information about HealthHub Finland EDIH's aforementioned tasks and about events and measures related to the management of stakeholder relations.

The following information can be saved from the registered:

- name of client/stakeholder organization
- name of the customer/customer/stakeholder organization representative
- task title
- contact information (address, website, telephone, e-mail, other possible contact information)
- company turnover, business model/solutions
 - Business ID
 - Country and location
 - billing information
- Description of needs and/or interests for services
- information related to the services ordered by the customer
- customer status
- information related to the expertise of the external expert
- Order history
- Customer forms (NDA, Digital maturity assessment, service contract, Business Finland forms etc.)
- information related to access control and video surveillance, if registered has visited our locations
- IT management data such as technical identifiers, log data, user names, technical information related to the use of the services offered

Training videos/broadcasts or images may contain identifiable information existing persons.

The data can be used for marketing purposes as long as the data controller needs the data for this purpose. Information for accounting purposes stored as long as required by law.

Service requests related to service activities are stored for 10 years from the end of the calendar year in which the service request was resolved.

Personal data stored on potential customers will be deleted if no customer or stakeholder cooperation is created.

The recipients or categories of recipients of the personal data	HealthHub Finland EDIH personnel from earlier listed partner organizations.
Transfer of personal data to non-EU/EEC country or international organisations	As a general rule, the data is not transferred outside the EU/EEA countries.
Period for which personal data are stored	<p>Storage is based on KAMK's data management plan and current legislation.</p> <p>The data is removed after HealthHub Finland EDIH ceases to operate. HealthHub Finland EDIH operates at least until 31.12.2025 but aims to continue for 31.12.2029 and beyond. Significant changes to the operational model will be notified to registered companies and contact persons.</p>
Is the provision of personal data a statutory or contractual requirement, or a requirement necessary to enter into a contract, and is the data subject obliged to provide the personal data? / What are the possible consequences of failure to provide such data?	Statutory and/or contractual requirement. Provision of personal data is a requirement necessary to enter into a contract with HealthHub Finland EDIH.
Register`s principles of protection	<p>Manual material:</p> <p>Paper material is stored in a locked archive space.</p> <p>Information processed by information technology and customer relationship management system:</p> <ul style="list-style-type: none"> * The register's electronic information systems are protected with appropriate technology measures including e.g. regular operating system and application updates, encrypted connections to the environment and a secure online environment. * Access rights are limited by a personal username and password. * Only those with HealthHubFinland EDIH access rights have access to the information. The only exception to this being the companies representatives offering the information technology and customer relationship management system services, which process personal data for for HealthHub Finland EDIH account based on the commission agreement. * Access is determined by the person's job duties. <p>The information is confidential.</p>
Origin of personal data other than from the data subject	The information is primarily obtained from the registered person himself, in person or by HealthHub Finland EDIH website contact form/chatbot or as below.

	<p>Information can be collected and supplemented e.g.</p> <ul style="list-style-type: none"> • from generally available sources (e.g. internet), • From the Vainu information service (based on the sales contract, the aforementioned information is available in public distribution) • contact registers purchased from external service providers • based on different forms of contact (email, phone, meetings, events)
<p>Processing of personal data for automated decision-making, incl. profiling</p>	<p>The processing of personal data does not include profiling or automated decision-making.</p>
<p>Data subject's individual rights</p>	<p>Right of data subjects to access their data</p> <p>Data subjects have a right to know what personal data are being processed and what data concerning them have been saved.</p> <p>Right of the data subject to rectification of data</p> <p>The data subject has a right to have any inaccurate or incomplete personal data concerning him or her rectified or completed without undue delay. In addition, the subject has a right to demand that all personal data concerning him or her that is no longer necessary be erased.</p> <p>Data subject right to erasure of data</p> <p>Depending on the legal basis, the data subject may have a right to have their personal data erased from the register of HealthHub Finland EDIH. This right shall not apply to cases where data processing is necessary for compliance with a legal obligation or for a task carried out in the exercise of official authority vested in the HealthHub Finland EDIH. The storage and erasure of data shall comply with the records management plans of HealthHub Finland EDIH and the data storage periods required by legislation.</p> <p>Right to restrict processing</p> <p>In certain situations, data subjects may have the right to restrict the processing of their personal data until the legal basis for the data or their processing has been duly checked and rectified or completed.</p> <p>Right to data portability</p> <p>The right to data portability means that the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the HealthHub Finland EDIH, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without</p>

	<p>hindrance from the HealthHub Finland EDIH. This right shall apply only to situations where the processing is carried out by automated means and is based on consent or on a contract.</p> <p>This right shall not apply to cases where data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. As a result, this right shall not apply, as a general rule, to the personal data files of the HealthHub Finland EDIH.</p> <p>Right of the data subject to object to processing of personal data</p> <p>Since the processing of personal data is based also on the data subject's consent, this right is not valid. In practice, objection/restriction takes place by withdrawing consent.</p> <p>Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing.</p> <p>The right of the data subject to withdraw consent</p> <p>In situations where the processing of the personal data is based solely on consent, the data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>As a rule, the withdrawal of consent is communicated to the party to which the original consent was given. If this is impossible, the data subject may e-mail to: kajaanin.amk@kamk.fi.</p> <p>The right of the data subject to lodge a complaint with a supervisory authority</p> <p>The data subject shall have the right to lodge a complaint with a supervisory authority, if they consider that the processing of personal data relating to him or her infringes the General Data Protection Regulation (EU) 2016/679. In addition, the data subject has a right to use other administrative or judicial remedies. Further information www.tietosuoja.fi.</p> <p>The data subject shall have the right to bring proceedings against the controller or the organisation processing the personal data before a court if the data subject considers that the processing of his or her personal data infringes the General Data Protection Regulation.</p>
<p>What to do when you want to exercise your rights?</p>	<p>To make any information requests related to his or her rights as a data subject, the data subject may contact the unit in charge or send an e-mail to kajaanin.amk@kamk.fi.</p>

Controller	Name: Kajaanin Ammattikorkeakoulu Oy	
	Address: PL 52, 87101 Kajaani	
	e-mail: kajaanin.amk@kamk.fi	
Contact details for the unit in charge	Name(s): CEMIS Business Development unit, Kajaanin Ammattikorkeakoulu Oy Dr. Anas Al Natsheh Mr. Joonas Tikkanen	
	Address: PL 52, 87101 Kajaani	
	Tel.: +358 44 7101 228 +358 44 7101 043	E-mail: anas.alnatsheh@kamk.fi joonas.tikkanen@kamk.fi
The data protection officer with contact details	Nimi: Tietosuojavastaava, Kajaanin Ammattikorkeakoulu Oy	
	Osoite: PL 52, 87101 Kajaani	
	Puhelin: 044 7101 237	Sähköposti: tietosuojavastaava@kamk.fi
Supervisory authority	Name: Tietosuojavaltuutetun toimisto	
	Address: Ratapihantie 9, 6. krs, 00520 Helsinki	
	Postaddress: PL 800, 00521 Helsinki	
	Tel.: 029 566 6700 Fax: 029 566 6735	E-mail: tietosuoja(at)om.fi