

PRIVACY POLICY KOTIHAMMAS OY

1. Account Holder

KotiHammas Oy

Business ID: 2547260-2

Nuijamiestentie 3C

00400 HELSINKI

The patient registry of Kotihammas Oy is made in technical co-operation with Kotihammas Oy clinics and with health care providers that work either as independent contractors or through separate companies as service providers at Kotihammas Oy.

2. Contact person for account registry related matters

Name: Matias Lustig, Branch Manager

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Phone number: +358 40 451 4419

3. Name of account registry

KotiHammas Oy patient registry.

4. The intended use of the account registry

The intended use of the registry/account is to inspect general dental health, as well as planning, execution, and follow-up of the health care procedure.

On top of the aforementioned, the registry is also being used to plan out the business practices of Kotihammas Oy, the statistical practices of Kotihammas Oy as well as other billing related practices of Kotihammas Oy, such as the billing of patients.

The patient registry of the registry holder holds possession of the following things:

- Appointment registry
- Medical report information
- X-Ray filming registry
- Billing registry

5. Information content of the registry

The following data can be saved about the registered patient:

- Basic personal information about the patient
 - Name
 - Social security number
 - Language
 - Place of residence and city of residence
 - Contact information
 - Contact person named by the patient, the caretaker of an underage patient
 - Any additional information given out by the customer
- Information regarding the health of the patient
 - Initial information and starting level
 - Health care information: planning of health care, execution of health care and evaluation of health care
 - Results related to clinical and radiological research
 - Medicinal risk related information
 - General health follow-up related information in relation to the dental health of the teeth and mouth
 - Diplomas, referrals and verdicts
 - The name of the markup author, the clinic of the markup author and the date and time of the markup
- Organizational and administrative information in relation to patient information and records
 - Appointment information
 - Billing information
 - Employer information in relation to external company employees
 - Other customer related information, such as special customer privilege group or special needs and restrictions posed by the customer

6. Rule-based information sources

The information is obtained and maintained in the corresponding format as it pertains to the patient itself or the patient's caretaker.

Any information related changes in relation to company or employment-based dental care is provided by the employer for patients under the company or employment-based dental care contract.

For patients under the employment-based dental care contract, any changes made to related information can be obtained from the employer. This information is necessary in order to make sure that work-related health care benefits are given only to those with direct access to them.

Information based on the purchasing service contract can be obtained from another health care service provider or from another health care contractor.

7. Rule-based handout of information outside of the EU or ETA regions

Any information in relation to patient databases, patient records or patient registry is always classified as confidential. The personnel, lead figures and employees of Kotihammas Oy have a non-disclosure agreement pertaining to anything that might relate to any information acquired through patient care.

Patient information can only be used by the personnel that are involved in the care-taking process of the patient in question. Any unauthorized access is not permitted.

As has been ruled under patient law, information relating to a certain person or entity can only be given out by the patient's agreement or by a certain law regulation.

Any information will not be moved outside of the EU or ETA regions.

8. The principles behind registry protection

Physical material and data

Physical material is always held behind locked premises, and the access is only given to authorized personnel.

Digitally processed information

The rights to access patient registry information inside patient databases and patient systems are assigned to those employees and contract personnel that require access based on their work tasks. Each user has pre-defined access to the aforementioned patient databases and patient systems and they also have a personal username and password. The access and usage of registry information is supervised through user log details.

9. Registry rights

A user with registered access has the right to view data on the patient register that is directly related to them. A survey request is initiated through a personal visit to a clinic or by referring to the signed document assigned to the specific address. On this basis the identity of the person in question can be reliably confirmed.

The survey request is performed either by personal means during a clinic visit or by sending a copy of the patient transcript to the patient.

If a fault is detected within the information, the registered person has the right to ask for a change within the information itself. The request for changing the information is initiated either during a personal visit or by referring to the method mentioned at part 2 by contacting the person responsible through a signed document. The registered person must explain the

reasoning behind the request.

The registered person has the right to decline the registry holder from accessing their personal information if the matter in question is related to direct advertising.