

## **Privacy Policy regarding Lääkärikeskus Aava Oy's Virta service**

### **1 Data controller**

Lääkärikeskus Aava Oy  
Business ID: 2311119-2  
Annankatu 32  
00100 Helsinki  
(hereafter "we" or "Aava")

### **2 Contact person for register matters**

Data Protection Officer Ida-Emilia Laasonen  
Phone: 010 380 3800  
Email: dpo@aava.fi

### **3 Name of the register**

Lääkärikeskus Aava Oy's Virta service's register

### **4 What are the legal basis and the purpose of processing personal data?**

The legal basis for processing personal data is the person's (data subject) (explicit) consent to processing his/her personal data including sensitive data regarding his/her health in Virta service.

The purpose of processing personal data is:

- performing an extensive and proactive blood test, which includes an analysis of the blood sample and an estimation based on the research (doesn't include a medical diagnosis) of the risk of getting cardiovascular disease, type 2 diabetes and other chronic diseases
- conducting the Virta wellbeing survey, where the data subject answers questions about their health and wellbeing
- combining the Virta wellbeing survey's answers to the health data analysed from the blood sample
- analysing and utilizing health data as a support to marketing (incl. direct marketing and electronic direct marketing) to offer the person suitable wellbeing services taking into consideration his/her personal needs
- development of Aava's products and services in order to offer our services taking into consideration our customer's needs

We use profiling to recognize e.g. person's welfare needs. We use this data to allocate marketing and to develop our services.

## **5 What data do we process?**

We process the following basic information of the person (data subject):

- Finnish personal identity code
- first and surname
- gender
- date of birth
- contact information: private email and phone number
- title
- individual identifier of the test result
- direct marketing bans and consents

The aforementioned data is necessary to perform Aava's wellbeing services and to enable contacts.

We process the following data concerning the health and wellbeing of the person (data subject):

- answers to the Virta wellbeing survey
- data concerning health based on the analysis of the blood test
- data of the person's state of health and conditions
- results and analysis derived from the aforementioned data for offering wellbeing services to the person

## **6 From where do we receive information?**

We receive information primarily from the person (data subject) him/herself and from the person's (data subject's) blood sample.

In addition, data may be collected and updated for the purposes described in this Privacy Policy from publicly available sources and authorities or based on the data received from third parties within the limits of the applicable legislation. This type of update is performed manually or by automated means.

## **7 To whom do we disclose and transfer data, and do we transfer data outside the EU or EEA?**

We use subcontractors for processing personal data on our behalf. We have outsourced the processing of the data related to analysing the blood samples, digital business service development, IT management and services related to direct marketing, to outside service providers.

The analysing of the blood samples will be made by Nightingale Health Oy.

We do not transfer health data outside the EU/EEA. Our subcontractors may process other data, person's basic information also outside the EU/EEA.

We have taken care of appropriate measures of transfer. We transfer personal data only to EU-U.S. Privacy Shield certified companies or use the standard contractual clauses approved by the European Commission.

## **8 How do we protect the data and for how long do we retain it?**

Only those of our employees, who due to their working duties are entitled to process the data of customers, have the right to use the systems containing personal data. Each user has their own personal username and password to the system. The data is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and their backup copies are stored in locked premises and can be accessed only by certain pre-designated persons.

We retain the personal data for as long as is necessary for the purpose of processing personal data. We retain the personal data based on your consent for five (5) years after which we will check with you whether you still want us to retain your personal data. After the expiry of your consent, the personal data concerning you is erased from the register. You may request the deletion of your personal data also earlier. After this the data is anonymized for research and statistical purposes.

We assess the necessity of retaining personal data on a regular basis taking into account the applicable legislation. In addition, we take care of such reasonable steps that ensure that no incompatible, obsolete or inaccurate personal data is retained in the register taking into account the purpose of the processing. We rectify or erase such data without delay.

## **9 What are your rights as a data subject?**

As a data subject, you have the right to inspect the personal data concerning yourself and to demand rectification or erasure of inaccurate, obsolete, unnecessary or unlawful data. If you have access to your own data, you may edit such data yourself. Insofar as the processing is based on consent, you have the right to withdraw your consent at any time. Please note, that cancelling the consent does not affect the lawfulness of the processing prior to the withdrawal of the consent.

As a data subject, you have the right to object or to demand restriction of processing your data and to lodge a complaint on the processing of personal data with the supervisory authority.

On grounds relating to your personal particular situation you also have the right to object to processing your personal data when the legal basis is Aava's legitimate interest. In connection with your request, you must specify the particular situation on which you base the objection. We may refuse to carry out the request regarding objection only subject to the conditions provided for by law.

In addition, as a data subject you have the right to object the processing, including profiling, when it is related to direct marketing, at any time and free of charge.

You always have the right to make a complaint to the competent data protection authority. In Finland this is the Data Protection Ombudsman, whose contact information is available at tietosuoja.fi.

**10 Who can you contact?**

All contacts and requests concerning this Privacy Policy must be submitted in writing or in person to the contact person named in section two (2).