

## Ovumia Fertinova's Privacy Policy Statement

We have changed our Privacy Policy Statement to correspond to the European General Data Protection Regulation (GDPR) which came into force on the 25<sup>th</sup> May 2018. This Privacy Policy Statement is based on Ovumia Fertinova's filing system for personal and patient data.

The secure processing of your personal and patient data is of the utmost importance to us and an essential part of our responsible operating principles. Ovumia Fertinova is committed to protecting the rights of individuals and to keeping your personal and patient data safe. This Privacy Policy Statement contains a description of how Ovumia Fertinova collects, uses, stores and protects personal and patient data and how it is committed to securing a high level of data security.

### 1 Controller

#### Ovumia Oy

Biokatu 12, 33520 Tampere, Finland

[info@ovumia.fi](mailto:info@ovumia.fi)

(hereafter "We" or "Ovumia Fertinova")

### 2 Data Protection Officer (DPO)

Fondia Baltic OÜ

Rotermanni 14

[anna.kosar@fondia.com](mailto:anna.kosar@fondia.com)

### 3 What is the legal basis for and the purpose of processing personal data?

Ovumia Fertinova processes personal data on the basis of **legitimate interest** (e.g. customer relationship management, invoicing), the explicit **consent** of a customer, the performance of a **contract**, a **legal obligation and/or the provision of health care or treatment**. The processing of personal data is necessary for Ovumia Fertinova to be able to fulfil its obligations which the examination and treatment of a patient and the ensuring of traceability required by the Act on Assisted Fertility Treatments and the Act on the Medical Use of Human Organs and Tissues place upon it.

The purpose of processing personal data is to:

- ✓ provide health and specialised medical care services,
- ✓ fulfil our contractual and other promises and obligations,
- ✓ organise the examination and treatment of patients and to plan, implement and follow up their treatment
- ✓ ensure the safety and traceability of donated and patients' own gamete

- ✓ enable the invoicing of patients for their treatment and examinations
- ✓ facilitate the use of patient data for Ovumia Oy's statistical and follow-up purposes
- ✓ monitor our activities and investigate possible claims for compensation
- ✓ potentially use patient data for scientific research, subject to a separately made agreement

#### 4 What data do we process?

The register of patients consists of patient records and technical records, which contain personal data required for the identification of a person (such as name, date of birth, identification number, home municipality and contact details, next of kin's data)\*, data concerning a possible partner, which is necessary for fertility treatments, and data created in connection with a patient's treatment and the organisation of their treatment or data which has been received for the treatment. The data content of the register of patients also includes:

- ✓ data recorded by psychologists and psychotherapists to which only the psychologist or psychotherapist in question has the right of access, unless agreed otherwise with the patient; for persons participating in fertility treatments, data about the eggs and sperm retrieved during treatment and data about the quantity and quality of embryos; the quantity and quality of embryos transferred to the womb and to storage; pregnancies achieved; miscarriages; terminations; childbirth information and information about the health of the children born
- ✓ data contained by the ultrasonography system
- ✓ Other possible information gathered with the data subject's consent (such as credit information)

(\* ) Committing personal data marked with an asterisk is a requirement for our contractual and/or customer relationship. Without the necessary information we are not able to provide the product and/or service.

#### 5 From where do we receive data?

Data relating to patient administration is collected from the patient themselves or, with the patient's consent, from their families, and data about their home municipality and address details, for example, from the Population Register Centre's Population Information System.

Data concerning medical treatments is collected from the data created during the examinations and treatments carried out at Ovumia Fertinova's clinics and, with the patient's consent, from other treatment units and the patient's family.

Data relating to service purchasing agreements is collected separately, based on the agreements in question. For the purposes described in this Privacy Policy, personal data and special categories of personal data may also be collected and

updated from publicly available sources and based on information received from authorities or other third parties within the limits of the applicable laws and regulations. Data updating of this kind is performed manually or by automated means.

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

Personal and patient data is subject to the secrecy obligation, and Ovumia Fertinova's staff are under an obligation to maintain professional secrecy on any data obtained in connection with treating a patient. Patient data can only be disclosed outside Ovumia Fertinova with the written consent of the patient, or under specific legislation.

Joining the common register requires the patient's consent, in which case the patient decides whether those participating in the use of the common register are able to access the patient data recorded in the controller's patient data system. The patient can cancel their consent for this at any time. The patient can also demand that data about a specific visit be kept secret, in which case the data can be accessed only by the person who entered the data. The patient's electronic prescriptions are recorded in the database known as the Prescription Centre. The controller is Kela, [www.kanta.fi](http://www.kanta.fi)

The patient data created at Ovumia Fertinova is not recorded in the Kanta archives maintained by Kela.

Data required by legislation is disclosed annually from Ovumia Fertinova's register of patients to the National Institute for Health and Welfare's national register of fertility treatments for research, planning and statistical purposes. This data cannot be attributed to a specific person.

The data related to invoicing can be handed over to the Controller's outsourced service provider responsible for invoicing and debt collection.

Data can only be disclosed outside the EU/EEA at the customer's written request.

## **7 Cookies**

Ovumia Fertinova utilises cookies and other techniques for studying the demographic reachability of its services and for the statistical monitoring of its visitor numbers. Ovumia Fertinova may also use data collected using cookies and other techniques in order to direct contents to its customers. Cookies and other techniques are used to analyse and further develop our services to ensure that we serve our customers as well as possible. Cookies are also used to improve the user experience; for example, cookies store data about the services and settings the customer used on a previous visit.

You can choose in your browser's settings whether you accept the use of cookies. If you do not accept the use of cookies, you will still be able to use the Ovumia Fertinova website and some of its services, but this choice may considerably limit the functionality of the website and services.

Ovumia uses the Google Analytics Display Advertising programme. This is why the users of the www.ovumia.fi service may come across Ovumia's advertising outside Ovumia's digital services.

With Ovumia's consent, Google may use first-party cookies (such as those of Google Analytics) which contain anonymous identifier data, together with third-party cookies (such as the DoubleClick cookie) in order to convey and optimise data and show advertisements based on the fact that the customer has used Ovumia's digital services.

Ovumia never discloses the personal data of its customers/users to external advertising networks.

The customer can at any time remove the advertisements of the Google Analytics Display Advertising or the tailored advertisements of the Google Display Network from use using the control tool for advertisement selection. If they wish, the customer can also prevent the use of the Google Analytics measuring tool by installing an add-on in their browser.

The Ovumia Fertinova website and services have links and connections to third-party websites and social extensions (such as the Facebook community add-on). The add-ons on the Ovumia Fertinova website which are maintained by third parties are downloaded from these services' own servers.

It is important to note that if you click on any link on Ovumia Fertinova's website that directs you from Ovumia Fertinova's website to a third party's website, Ovumia Fertinova does not have control over such a website and is not liable for the third party's actions even if the connection exists between the websites. Before you proceed to a third-party website from Ovumia Fertinova's website, we recommend you familiarise yourself with that particular website's privacy policy before sharing any data.

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

The protection of personal data is at the core of our business. We use appropriate technical, organisational and administrative safety measures to protect all the data in our possession from being lost, abused, used illicitly, disclosed, altered or destroyed.

Ovumia Fertinova's personal and patient register data is processed using data processing. Patient data may only be used for the treatment of the person in question or the tasks relating to their treatment.

The Ovumia Fertinova staff have access to use the company's computers via a personal user identifier and password. Ovumia Fertinova's top management decides which employees should have access to the data in the register of patients and provides access to it only to the extent that their duties require it. Only those of our employees, who, in the course of their work, are required to process customer data, are entitled to use a system containing personal data and special categories of personal data. Each user has a personal username and password to the system; in other words, access to personal data or special categories of personal data is granted on the basis of a role-based authorisation concept.

The company's computers are located in Ovumia Fertinova's premises in locked rooms protected with an alarm system, and only the company's staff have access to these.

Patient data which is stored manually instead of electronically and which is subject to the obligation of secrecy, is stored in the company's premises in locked rooms protected with an alarm system, and only the company's staff have access to these.

We store your data as long as it is necessary for the purpose of processing the data and only within the time limits of the applicable laws and regulations.

We regularly estimate the need for data storage, taking into account the applicable legislation. In addition, we take care of such reasonable actions whose purpose it is to ensure that no incompatible, outdated or inaccurate personal data is stored in the filing system, taking into account the purpose of the processing. We correct 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, which is stored in the filing system, and the right to require the rectification or erasure of the data. You also have the right to withdraw or change your consent.

According to the EU's General Data Protection Regulation, as a data subject, you have the right to object to the processing of your personal data or to request the restriction of the processing of your personal data and to lodge a complaint with a supervisory authority responsible for processing personal data.

For specific personal reasons, you also have the right to object to the profiling of your personal data and other processing concerning you, when processing the data is based on the customer relationship. In connection to your claim, please identify the specific situation on the basis of which you object to the processing. We can refuse to act on such a request on the basis of the law.

## **10 Who can you contact?**

All contacts and requests concerning this Privacy Policy shall be submitted in writing or in person to Ovumia Fertinova's DPO mentioned in section 2.

## **11 Changes to the Privacy Policy**

Should we make amendments to this Privacy Policy Statement, we will place the amended statement on our website, with an indication of the amendment date. If the amendments are significant, we may also inform you about this by other means, for example by email or by placing a bulletin on our homepage. We recommend that you review these privacy protection principles from time to time to ensure you are aware of any amendments made.