

Personal data processing in MUONAhealth[®]-service

This document describes personal data collection and processing in MUONAhealth-service ("Service") of Ravistamo Ltd ("Ravistamo").

To clarify, individual Service Providers, who use the Service may distribute their own, more detailed guidance of the personal data processing for their own users using the Service. In this case this more detailed guidance should be used alongside this document.

I. Controllers and processors

Personal data controller is the health and social service provider, who has purchased a license from Ravistamo for the use of the Service ("Service Provider"). Service Provider will provide data protection contact information in their website or other documentation regarding data processing.

Principal personal data processor is Ravistamo Oy (Business ID 2771615-6), mailing address: Siikaranta 9 A 70620 Kuopio. Data protection officer at Ravistamo is Kati Laine (kati@ravistamo.fi).

Ravistamo is considered to have a limited role as a data controller for the anonymized data archived in the Service.

Ravistamo uses the following sub processors for the Service:

Platform service (currently Microsoft Azure)

E-mail service provider (currently Mailgun.com)

Service development and maintenance partner (currently Nolwenture Oy)

Processor and sub processors process the data according to guidance provided by the data controller in separate written processing contracts.

2. Categories of data subjects

When using the Service, personal data is collected and processed from the following categories of data subjects:

Service Provider users, typically nursing staff ("Users")

Service Provider customers ("Residents")

3. Personal data processing

Personal data described below is being collected and processed in the Service. Information is categorized as "Service Provider personal data", i.e., information where Service Provider is the controller of data, and "Ravistamo personal data", i.e., where Ravistamo is the controller of data.

Users typically input their own data to the Service, however Service Provider may input some data from their own systems. Users input the residents' personal data. Personal data processing is necessary to use the Service.

Service Provider's personal data

User personal data

Personal data	Basis of data processing	Purpose of data processing	Data erasure
Individual alpha numeric personal number	Execution of contract between the Service Provider and the User (GDPR art. 6 (1) (b))	User identification in the Service, connecting relevant information to correct User in the system, administration of User licenses	2 months after the Service Provider has stopped using the Service or 2 months after the User has stopped working for the Service Provider, whichever is sooner.
Name		User identification in the Service, connecting relevant information to right User in the system	
E-mail address		Contacting and information releasing related to the Service	
Role		Defining the licenses of the User	Certain User information can be retained longer than defined above for example if the legislation regarding electronic patient record systems requires to do so.
Care unit		Connecting User to correct Service Provider and Residents, administration of user licenses	
User IP address, Usage information of the Service		Error and misuse detecting and interfering to ensure availability of the Service	
	Legitimate interests of Service Provider (GDPR art. 6 (1) (f))	Access control, keeping a log of viewing and editing Residents' information	

Resident personal data

Personal data	Basis of data processing	Purpose of data processing	Data erasure
Individual alpha numeric personal number	Execution of contract between the Service Provider and the Resident (GDPR art. 6 (1) (b))	Resident identification in the Service, connecting relevant information to correct Resident in the system	Information will be erased from the Service within 2 months after the Service Provider stops using the Service
Name, personal identity code	Execution of contract between the Service	Resident identification in the Service, connecting relevant	

	Provider and the Resident (GDPR art. 6 (1) (b))	information to correct Resident in the system	<p>or 2 months after the Service has been stopped for the Resident, whichever is sooner</p> <p>Parts of information saved to the Service can be transferred to other systems of the Service Provider and retained longer for example if the legislation regarding electronic patient record systems requires to do so</p>
Unit and room	Execution of contract between the Service Provider and the Resident (GDPR art. 6 (1) (b))	Connecting Resident to correct Service Provider and Users, administration of user licenses of Users	
Date of birth, gender, height, weight	Execution of contract between the Service Provider and the Resident (GDPR art. 6 (1) (b))	Relevant background information collection of the Resident for the use of the Service	
Diet information, nutrient intake, changes in nutrient intake, weight changes, information of any acute illnesses	Execution of contract between the Service Provider and the Resident (GDPR art. 6 (1) (b))	Execution of the core purpose of the Service – weight and nutrient intake tracking	
Health and nutritional questionnaires, containing among other things the following information: health information, need of assistance, medical intake, infections and other problems, mood, use of intoxicants	Execution of contract between the Service Provider and the Resident (GDPR art. 6 (1) (b))	Risk scanning and screening related to the health and nutrient intake, recommendations related to treatments and risk control	
Conclusions of the state on malnourishment rising from health questionnaires and other information	Execution of contract between the Service Provider and the Resident (GDPR art. 6 (1) (b))	Recommendations related to treatments and risk control	

"Story" of the Resident, an open field of information where to input other background data of the Resident and other related personal data	Execution of contract between the Service Provider and the Resident (GDPR art. 6 (1) (b))	Sharing of resident's backstory to ease the interaction between the Resident and the nursing staff	
Open field of information for observations of the Resident and other related personal data	Execution of contract between the Service Provider and the Resident (GDPR art. 6 (1) (b))	Resident's information distributing to nursing staff related to the Resident's care	

Ravistamo's personal data

User personal data

Personal data	Basis of data processing	Purpose of data processing	Data erasure
Resident's health questionnaire results and individual answers, dietary information, background information (height, weight, year of birth, gender), weight changes, nutrient intake, need of assistance, individual alpha numeric personal number	Legitimate interests of Ravistamo and its partners (GDPR art. 6 (1) (f) – see point 4	Personal data anonymization to utilize anonymized personal data for scientific or commercial research	Personal data will be erased from Ravistamo's systems immediately after anonymization or at latest when Service Provider defined time for erasure is met

4. Personal data processing based on legitimate interests

The Service processes personal data based on legitimate interests (GDPR article 6 (1) (f)) in two situations:

- a. Service Provider User IP addresses are processed based on legitimate interests to detect and interfere in error and misuse to ensure functionality and availability of the Service. User IP address processing does not cause severe hazard to the rights and freedoms of the User and this processing is necessary and proportionate to ensure the functionality of the Service.
- b. Resident's information related to nutrient intake, health and background information are anonymized by Ravistamo. The data processed is sensitive as such, however the processing is short-term and efficient anonymization using the up to date technology ensures the data cannot be linked to individual person after anonymization. The probability of information leak or anonymization failure is very small, therefore as a whole the hazard to the rights and freedoms of the data subjects is moderately small. However, processing may result in significant and commercially valuable inventions or improvements related to the nutrient intake and health management technology.

5. Special personal data categories

Service Provider controls the following special personal data categories:

- Dietary information, nutrient intake, changes in nutrient intake, changes in weight, information of any acute illnesses
- Health and nutritional questionnaires, containing among other things the following information: health information, need of assistance, medical intake, infections and other problems, mood, use of intoxicants
- Conclusions of the state on malnourishment rising from health questionnaires and other information
- Open field of information for observations of the Resident and other related personal data (where they are related to health and nourishment)

Regarding the Service Provider special personal data categories can be processed under GDPR article 9 (2) (h) due to contract with health care service provider, i. e. based on the Resident caring relationship with Service Provider i. e. health care service provider.

Ravistamo controls the following special personal data categories:

- Resident's health questionnaire results and individual answers
- Dietary information, background information (height, weight, year of birth, gender)
- Weight changes
- Nutrient intake
- Need of assistance

Regarding Ravistamo special personal data categories can be processed under GDPR article 9 (2) (j) and Finland's data protection law 6 § subsection 1 paragraph 7 due to scientific or historical research and statistics.

6. Personal identity code processing

Processing of personal identity codes when using the Service is allowed by the Service Provider under Finland's data protection law 29 § subsection 2 due to status as a service provider of health and social services.

7. Profiling and automated individual decision-making

No decision-making is made in the Service based solely on automated processing such as profiling.

The Service utilizes profiling as such for health and nourishment questionnaires. Residents' health and nourishment information from these questionnaires are compared to defined limit values on the basis of which the Resident is placed in a previously defined category on the basis of which general recommendations of care and nourishment are given. These categories/profiles are not individual but are defined for all questionnaire users based on certain limit values.

8. Data transfers

The Service is provided to data subjects located within the EU/EEA area using servers inside the EU and personal data is not transferred outside the EU/EEA. However, personal data can be processed outside the EU/EEA using a remote connection for providing the Service. This processing outside the EU/EEA is based on either the adequacy decision (GDPR Article 45) of EU Commission or on the standard contractual clauses (GDPR Article 46) with the addition of the Service Provider and Ravistamo have taken necessary additional protection to ensure the realization of the data subjects' rights outside the EU/EEA. Data subjects have the right to request a copy of the standard contractual clauses by contacting Ravistamo via e-mail to the address in section 1.

9. Rights of data subjects

Data subjects have the following rights:

- Data access and rectification: The data subjects have the right to request access and obtain confirmation whether personal data concerning them is being processed, what personal data is processed and the basis and purpose of processing. Data subjects have the right to demand rectification of inaccurate data.
- Right to demand restriction of processing: Data subjects have the right to demand restriction of processing in certain situations.
- Right to erasure of personal data: Data subjects have the right to have their personal data erased for example if the personal data is no longer necessary in relation to the purposes for which they were processed, there is no longer a legitimate interest for the processing, or the data must be erased for some other reason.
- Data transfers: Where personal data is processed automatically without the consent of the data subjects or where processing is based on the execution of a contract, the data subject has the right to demand to obtain their data in a structured, generally used,

machine readable format. Data subjects also have the right to demand their data to be transferred to another controller where it is technically possible.

- Right to lodge a complaint: Data subjects have the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to them violates the data protection regulation. Ravistamo domicile supervisory authority is the data protection ombudsman: <https://tietosuoja.fi/en/home>.

10. Changes to this document

Ravistamo reserves the right to make changes to this document periodically. Updated document will be published via the company's website and in Service Provider's premises or other channels if possible, and the data subjects will be notified if necessary.

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