

*Entteri Professional Software Oy*

# Data Protection Notice

*Identification transaction data register and personal data processed concerning it*

## ENTTERI'S COMMITMENT TO DATA PROTECTION

Entteri is committed to protecting your privacy.

We respect your data subject rights. We inform you concerning our data protection policies and the purpose and legal basis for processing your personal data when collecting your data. We only retain your personal data for as long as it is necessary.

We only disclose your personal data to appropriate and authorised third parties who also respect our privacy policies. We always use appropriate transfer mechanisms and safeguards when processing and transferring personal data.

## ENTTERI'S DATA PROTECTION NOTICE

This Data Protection Notice describes how Entteri Professional Software Oy (hereinafter "Entteri") collects, manages and protects your personal data concerning the processing of identification events related to strong electronic identification, when you identify yourself to the electronic services implemented and technically maintained by Entteri, which Entteri's customers utilise in providing healthcare services to their customers and potential customers. Such services include online appointment and an electronic patient history form. Personal data contained in the identification events processed concerning strong electronic identification and their processing form the Identification Transaction Data Register, which is part of Entteri's register keeping.

This Data Protection Notice describes how Entteri processes the personal data of the Identification Transaction Data Register as a Controller.

## PURPOSES AND LEGAL BASIS OF DATA PROCESSING

Entteri processes personal data only if there is a legal basis for it. Entteri uses consent as a legal basis for processing personal data in the processing of strong electronic identification authentication event.

## CATEGORIES OF PERSONAL DATA PROCESSED

Concerning the processing of the Identification Transaction Data Register, Entteri processes the following categories of personal data:

- Personal data (name and personal ID) received from the identification proxy service concerning the identification event
- Identified person's IP address
- Browser and operating system used
- Identification time (timestamp)

- Information on which Entteri's customer company and Entteri service used by the customer the identification concerns
- Information on the data subject's consent to the processing of personal data

Personal data is obtained from the [identification proxy service belonging to the strong electronic identification trust network](#), based on the consent given by the data subject. The data subject may at any time suspend the processing based on their consent by suspending the use of the service in which they have been strongly identified. This is done, for example, by closing the browser or interrupting the use of the online appointment or the patient history form (*Interrupt* function) before confirming the appointment or sending the patient history form to Entteri's customer in the service.

## RETENTION PERIOD

Entteri retains personal data only for as long as it is necessary to fulfil the purposes described in this Data Protection Notice or to comply with mandatory legal requirements.

The identification event data is session-specific and thus temporary, which is only momentarily retained in the user's browser, its settings and cookies for the duration of the use of the service. If the data subject decides to discontinue or interrupt the session, the session-specific data will not be retained (excluding log data), but identification and the related consent is always provided again on a case-by-case basis.

The retention period of log data generated from identification events is 10 years.

Entteri regularly evaluates the necessity of retaining the personal data processed concerning the Identification Transaction Data Register, and the legal basis for the processing in accordance with its internal code of conduct.

In some circumstances, Entteri may anonymise personal data, for example for statistical purposes. The processed personal data is permanently destroyed or anonymised after the retention period has expired.

## TRANSFERRING AND PROCESSING DATA OUTSIDE THE EU/EEA

Personal data is not transferred outside the EU/EEA.

Entteri discloses the data of the strong electronic identification event to healthcare units acting as customers or using the service ordered from Entteri, or to independent healthcare practitioners with whom the data subject is in a customer relationship or wishes to enter into a customer relationship in the electronic service provided by Entteri to its customers. Each health care unit or independent practitioner receiving the data of the data subject by disclosure is its own data controller, who processes the data for the purpose of health care in accordance with its own privacy statement.

## SECURITY OF DATA PROCESSING

Entteri maintains appropriate and adequate organisational, technical and physical safeguards to protect the personal data processed by Entteri from unlawful or unauthorised destruction, alteration, use or disclosure or loss. Only authorised persons have access to the personal data held by Entteri and their right to use the data is strictly based on the need to access to information. Entteri requires all its employees who have access to any personal data to treat the data as strictly confidential.

## YOUR DATA PROTECTION RIGHTS

Subject to applicable data protection legislation, you may have the right to

- have access to your personal data held by Entteri
- require Entteri to rectify any inaccurate or erroneous personal data
- withdraw your consent at any time if the processing of personal data is based on your consent
- in some circumstances demand the transfer of your personal data to another party
- in some circumstances demand the deletion of data or restriction of processing, or to object to the processing of data.

If you wish to exercise any of these rights, you may submit a request to us by filling in a request concerning the processing of personal data by email at [tietosuojavastaava@entteri.fi](mailto:tietosuojavastaava@entteri.fi).

You have the right to lodge a complaint with the appropriate data protection authority if you are not satisfied with Entteri's data protection policies.

## ENTTERI CONTACT DETAILS

If you have questions concerning Entteri's data protection practices or need more information, you may contact Entteri by writing to the following addresses:

ENTTERI data protection officer  
[tietosuojavastaava@entteri.fi](mailto:tietosuojavastaava@entteri.fi)

PLANMECA data protection officer  
[dpo@planmeca.com](mailto:dpo@planmeca.com)

## AMENDMENTS TO THIS DATA PROTECTION NOTICE

Entteri may, if necessary, update this Data Protection Notice in accordance with amendments made to the data protection policies. This notice was updated 13.3.2023