

# **Personal Data Policy at PPclinic**

*Rev. Jan. 2020*

## **Personal Data Policy**

In connection with our examination, diagnosis, and treatment of you as a patient, PPclinic, as the data controller, collects and processes personal information.

In this personal data policy statement, we describe how we obtain, process, disclose, and store your personal information, while also providing you with information about your rights and who to contact if you have any objections.

## **Information and Intent**

We collect and process the following personal information about you (to the extent that it is relevant for you specifically):

### *Common personal information*

- Your name, home address, phone number, email address, personal identification number, gender, family relationships, and social relationships.

### *Protected personal information (sensitive personal information)*

- Health information, such as medical records, test results, and clinical tests. If there are any changes to your information, we will register the changes.

There may be situations where we handle information that is not listed above. In these cases, you will be informed of this.

## **Intent**

We process your personal information for the following purposes:

- Our examination, diagnosis, and treatment of you.
- Referrals to and communication with other healthcare professionals, doctors, hospitals, hospital laboratories, or other treatment facilities.
- Prescribing medication, including writing prescriptions on a prescription server.
- Registering laboratory test samples to hospital laboratories.
- Preparing medical statements.
- Preparing statements for use by authorities, insurance companies, etc.
- Reporting to clinical quality databases.
- Handling requests and complaints from registers and others.
- Handling inspections and requests from regulatory authorities.

- Statistical surveys and scientific research.
- Handling disputes with registered and third parties.
- Billing purposes.

### **Automatic, Individual Decision-Making**

Your personal data will not be used for automatic, individual decision-making or profiling.

### **Source**

We receive your personal information from you, other healthcare professionals such as hospitals or referring doctors, by searching electronic records, municipalities or public authorities, schools, or educational institutions.

We process the received information in accordance with this Privacy Policy.

### **The Legal Basis for Processing Personal Information**

We have a duty to comply with applicable laws including the EU's General Data Protection Regulation, the Data Protection Act, and other relevant healthcare legislation such as compliance with the fundamental principles of personal data processing, and legal basis for processing, and implementing the fundamental principles of personal data processing and legal basis for processing.

The legal basis for collecting, processing, and disclosing your personal information is:

- For general patient treatment, common personal information is collected, processed and disclosed in accordance with Article 6 (1) (C) and (d) of the General Data Protection Regulation, while sensitive personal information is collected, processed and disclosed in accordance with Article 9 (2) (a) of the General Data Protection Regulation, disclosure based on consent (c), for diagnosis and treatment (h) and reporting to quality databases (I).
- In addition, we are obligated to process some personal information about you for general patient treatment in accordance with the Authorization Act Chapter 6, the regulation on health professional's records (Journal Regulation) particularly §§5-10 and Chapter 9 of the Health Act.
- Health information for the purpose of further treatment upon referral of patients is disclosed in accordance with the Agreement on Specialist Medical Assistance §§20-23 and the Health Act.
- Registering laboratory test samples to hospital laboratories is done in accordance with the guidelines from the Danish Health Authority on handling paraclinical examinations in accordance with the Authorization Act.
- Information used for billing of patient treatment is sent to you or the referring party in accordance with the Agreement on Specialist Medical Assistance §§49 and the Health Act.

- Medication prescriptions are sent via the IT service's prescription server in accordance with Chapter 42 of the Health Act and the regulation on prescriptions and dose dispensing of drugs, particularly Chapter 3.
- Clinical patient data is disclosed to clinical quality databases in accordance with the rules of §§195-196 of the Health Act and the regulation on reporting of information to clinical databases, etc. Data can also be disclosed based on specific consent from you as a patient.
- Discharge summary statements, which are a brief summary of the patient's medical history and treatment course, are sent to the referring doctor and in some cases to the referring hospital in accordance with the rules of Chapter 9 of the Health Act.
- Your personal information is only disclosed to your relatives with your prior consent in accordance with the rules of §43 of the Health Act.
- For deceased patients, certain personal information can be disclosed to the deceased's closest relatives, the deceased's general practitioner and the doctor who had the deceased in treatment in accordance with the rules of §45 of the Health Act.

### **Revocation of Consent**

If the process is based on your consent, you have the right to revoke your consent. If you revoke your consent, it will not affect the treatment prior to your revocation of consent, including a disclosure based on consent.

### **Disclosure of Personal Information**

To the extent that it is necessary for the current examination, diagnosis, or treatment of you, your personal information will be disclosed and shared with other healthcare professionals:

- When referring to healthcare professionals, information is disclosed to which the referral is sent.
- When registering laboratory test samples, the samples are disclosed to the hospital laboratory.
- When registering information in connection with billing for patient treatment, the information is disclosed to the referring party.
- When issuing prescriptions, the information is disclosed to Danish pharmacies and the Danish Medicines Agency via the prescription server.
- When reporting to clinical quality databases.
- When disclosing discharge summary statements, the information is disclosed to the referring doctor and in certain cases the referring hospital.

In other cases, information is disclosed to relatives or insurance companies, schools, or municipalities.

Information is disclosed to other authorities, clinical quality databases, the Danish Patient Safety Authority, the Danish Shared Medication Record, the police, social authorities, and the Danish Labour Market Insurance. The information is disclosed to the extent that there is a legal obligation to do so according to the current legislation.

### **Transferring Personal Information to Data Processors**

Your personal information is processed and stored by our IT supplier, who stores it on behalf of and according to instructions from us. Our data processors are currently an electronic medical records system (in connection with support), a dictation system, and an email system.

### **Data Retention Period**

We retain your personal information for as long as we need to fulfill the previously stated purposes.

The personal information that we process in connection with general patient treatment, we are in accordance with the Journal Regulations obligated to store for a minimum of 10 years after the last entry in the journal. Personal information that we process in connection with billing purposes, we store for five years (fiscal years). Common personal data that is included in correspondence and is not a part of patient treatment or forms the basis for billing is typically deleted after twelve months. There may be cases where we are forced to store your personal information for a longer period of time, for example in connection with a complaint or compensation case.

### **Your Rights**

You have - subject to the limitations of the law - certain rights, including the right to access personal information, the right to have incorrect information corrected, the right to have information deleted, the right to limit information, the right to data portability (the right to have your data transferred to another provider), the right to object to the processing of personal information, including in relation to automated, individual decision-making (profiling). You also have the right to file a complaint with a competent regulatory authority, including the Danish Data Protection Agency.

### **You Have the Right to Access Your Personal Information**

You have at any given time the right to know what information we process about you, where it comes from, and what we use it for. You can also find out for how long we retain your personal information, and who receives information about you, to the extent that we disclose data in Denmark.

If you request it, we can provide you with the data we process about you. Access may be limited due to the privacy of other people, trade secrets, and intellectual property rights.

### You Have the Right to Have Inaccurate Personal Information Corrected or Deleted

If you believe that the personal information, we process about you is inaccurate, you have the right to have it corrected. You should contact us and inform us of what inaccuracies exist and how they can be corrected.

In some cases, we will have an obligation to delete your personal information. This applies, for example, if you withdraw your consent. If you believe that your information is no longer necessary in relation to the purpose for which we collected it, you can request that it be deleted. You can also contact us if you believe that your personal data is being processed in violation of the law or other legal obligations.

When you contact us with a request to correct or delete your personal information, we will investigate whether the conditions are met, and if so, carry out the changes or deletion as quickly as possible.

### You Have the Right to Object to Our Processing of Your Personal Information

You have the right to object to our processing of your personal information. You can also object to our disclosure of your information for marketing purposes. You can use the contact information below to send an objection. If your objection is justified, we will ensure that the processing of your personal information is stopped.

You have the right to receive the personal information that you have provided to us and the information that we have obtained about you from other parties based on your consent. If we process data about you as part of a contract where you are a party, you can also have your data provided. You also have the right to transfer this personal data to another practitioner.

If you wish to use your right to data portability, you will receive your personal data from us in a commonly used format.

If you wish to access your data, have them corrected or deleted, or object to our data processing, we will investigate whether it is possible and give you a response to your request as quickly as possible and no later than one month after we have received your request.

### You Have the Right to File a Complaint

You are always welcome to contact PPclinic if you have any questions or wish to file a complaint about the processing of your personal information. If you are not satisfied with our response, you have the option to file a complaint with the Danish Data Protection Agency. Learn more on [The Danish Data Protection Agency's website](#)

## **Contact**

If you have any questions or comments regarding our use of your personal data or your rights, feel free to contact us at +45 33 69 09 66 or [info@ppclinic.dk](mailto:info@ppclinic.dk).

### **PPclinic Copenhagen**

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