

1. Controller

Pohjois-Savon sairaanhoitopiiri
P.O. Box 100 (Puijonlaaksontie 2), 70029 KUH
0171495-3

2. Controller's contact person and contact details

Janne Niemeläinen, HR and Administrative Director, tel. +358 44 717 9460
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Marja Hietämäki, Staff Development Manager, tel. +358 44 717 2117
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3. Name of filing system

The processing of personal data related to training activities

4. The purpose and lawfulness of the processing of personal data

Planning, implementation, monitoring and reporting related to training and education provided by the Hospital District of Northern Savo, including online courses. The financial management and invoicing related to training, and the development of training. The management of the statutory and voluntary duties of the hospital district.

In addition, personal data accumulated in a log as a result of using e-services are used in monitoring the capacity of the server and telecommunications as well as in investigating technical issues and abusive conduct.

The data processed in the filing system concerns the employees of the organisation, employees of other organisations, contracting partners and other collaborators, and students who have participated in education and training organised by the Hospital District of Northern Savo.

For which purposes may personal data be processed?

The following information systems are used in processing personal data:

- HRM information system / Uranetti
- Surveypal
- the Rondo electronic invoicing system
- the Moodle online learning environment
- user administration by Istekki Oy
- eLecture / Vidyo
- Planet eStream
- an electronic file server

- a regional training calendar
- e-mail

The legal basis for the processing of personal data

The filing system contains no special categories of personal data.

5. The data content of the filing system

The data processed in the filing system concerns the employees of the organisation, employees of other organisations, contracting partners and other collaborators, and students who have participated in education and training organised by the Hospital District of Northern Savo. The following data may be stored on data subjects:

The person's basic and background information, and identifiers

- the person's basic information (incl. name, professional title, contact information)
- employer's basic information (incl. address, business ID)
- information related to invoicing (incl. invoicing address, business ID, the final digits of personal identity code)
- user ID and password
- identifier formed in the organisation's HR system

Depending on training, the following information may also be collected:

- professional competence
- work experience
- other significant additional information related to the training
- information stored by users in the online learning system, including language preferences, description, photograph.

Information regarding participation in training activities

- information on registration and participation
- log data from the online learning environment, information of courses passed and course assessment
- feedback on the training
- recorded lectures by experts

Billing address

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6. The period for storing personal data

The duration for storing personal data is determined in accordance with an information management plan (previously known as a records management plan) as follows:

- registration for training, stored electronically 1 yr.
- a list of participants on paper, 5 yr.
- feedback on the training, 2 yr.
- lists of training participants, 5 yr.
- information on students passing the training for longer-term training and education, 5 yr.
- information related to invoicing in accordance with the Accounting Act
- data stored in the online learning environment are retained until the expiry of the user ID. The storage of information concerning passed courses and training complies with the above periods for storing data.

7. Regular sources of data

The personal data necessary for processing are obtained as follows:

From the person him/herself: personal data (via a system or form, or by e-mail).

8. The recipients of personal data and regular disclosure

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The data in the filing system are processed by employees of the controller, the Training and Development Services of the Hospital District of Northern Savo.

The personal data are transferred to the following internal services used by the Hospital District of Northern Savo:

- HRM system / Uranetti
- Rondo rotation and archiving of invoices

The Monetra Pohjois-Savo Oy financial and human resource management company processes personal data on behalf of the hospital district (beginning on 1 January 2019) in financial and human resource management tasks and Istekki Oy in tasks related to technical support and user administration of information systems.

Personal data are disclosed as follows; Statistical data on the number of participants in training courses are annually provided to the KUH personnel report and the KT Local Government Employers. A list of participants is disclosed to those involved in providing part of the training, persons in charge of training and/or experts providing training, or as an attachment to the company participating in the training as an exhibitor. Information about the numbers of training participants from the health centres and hospitals belonging to the Hospital District of Northern Savo is annually reported to the contact persons in the organisations. Data are disclosed to Istekki Oy for the management of user IDs and to Monetra Pohjois-Savo Oy for tasks concerning system administration. The distribution of recorded lectures is carried out as agreed.

The Monetra Pohjois-Savo Oy financial and human resource management company processes personal data on behalf of the hospital district in financial and human resource management tasks and Istekki Oy in tasks related to technical support and user administration of information systems.

The terms of the processing have been agreed in writing and based on a separate agreement.

9. The transfer of data outside the European Union or European Economic Area

No

No data are transferred outside the European Union or European Economic Area

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10. The principles of securing the filing system

The management of the information systems used in the processing of personal data complies with the data protection rules and instructions of the Hospital District of Northern Savo. The information systems and their user interfaces have been protected with technical solutions such as a firewall, and the data are regularly backed up.

Access to the information systems has been restricted with the application of user right categories ensuring that each user may only access the data required by their work tasks. The data in the filing system have been protected against inappropriate access, changes and erasure. The protection is based on personal user IDs and user rights restrictions.

Manual data, including lists of participants on paper, are stored in a locked facility. After the storage period, the data will be destroyed appropriately. Entry into the facility is based on limited access.

Issues of the confidentiality of data, and the storage periods, archiving and erasure have been determined in the hospital district's information management plan (previously known as a records management plan). For electronic systems, data protection is based on personal user IDs and user rights restrictions.

11. Profiling

No.
No data are used for profiling.

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12. Permanent storage

No.
The filing system contains no permanently stored data.

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13. Right of access by the data subject

Data subjects are entitled to obtain from the controller confirmation as to which of their data have been stored in the controller's filing system. The request for confirming data must be submitted in writing in accordance with section 2 of this privacy policy. The controller may refuse to disclose the data under criteria determined in data protection legislation. In this case, a certificate of refusal including the reasons for the refusal is submitted to the data subject. As a rule, data subjects may exercise their right to confirm which of their data have been stored free of charge with certain limitations determined in data protection legislation.

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14. The right of the data subject to rectification, erasure or restriction of processing and withdrawal of consent

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate, unnecessary or obsolete personal data concerning him or her. For the parts that the data subject is unable to personally rectify the data, he or she must submit a request for rectification in writing to the contact persons identified in section 2 of this privacy policy. The request must identify which data needs to be rectified and the reason for the rectification. The data subject also has the right to obtain from the controller restriction of processing, for instance for a period when the data subject is waiting for the controller to reply to a request for the rectification or erasure of personal data submitted by the data subject.

If the lawfulness of the processing of personal data is based on the consent of the data subject, the data subject shall have the right to withdraw this consent at any given time.

15. The right of the data subject to object to the processing of personal data and direct marketing.

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her for profiling and other processing for the part that the personal data are processed on grounds of the legitimate interests of a controller. The data subject may submit a claim on objecting the processing in accordance with section 2 of this privacy policy. In the context of the claim, the data subject must identify the particular situation which is the basis for objecting to the processing. The controller may refuse the request concerning the objection if it has compelling legitimate grounds for storing the data in order to manage its duties. In this case, a certificate of refusal including the reasons for the refusal is submitted to the data subject.

16. The right of the data subject to lodge a complaint with a supervisory authority

The data subject shall have the right to lodge a complaint with a supervisory authority particularly based on the location of his or her permanent place of residence or work if the data subject considers that the processing violates the EU's General Data Protection Regulation 2016/679.

17. Further information on the rights of the data subject

The General Data Protection Regulation of the European Union (EU 679/2016) provides for the rights of data subjects. Supplementary national legislation will further lay down provisions on the matter.

The Office of the Data Protection Ombudsman publishes information on the rights of data subjects on its website at www.tietosuoja.fi and provides instructions on exercising the rights.

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