

Falck Healthcare A/S' Privacy Policy Regarding Treatment at First Aid Station Femern

In connection with examination and treatment in First Aid Station Femern, Falck Healthcare A/S ('Falck') is collecting and processing certain personal data about you.

In this privacy policy we will describe the processing, usage, and disclosure of your personal data.

1. Why is Falck processing your data related to your treatment in First Aid Station Femern

To offer you treatment in First Aid Station Femern, Falck will for different purposes process your personal data.

Here you can see under what circumstances and to what purpose Falck will process your data:

- a. Administration of you as a patient in the clinic patient system
- b. Examination, diagnostics, and treatment of you in the clinic
- c. Receival, collection and disclosure of necessary patient information with health personnel internal as well as external, surrounding your examination and treatment
- d. With your acceptance, the disclosure of information about you to a 3rd party like your employer and insurance company etc.
- e. Comply with legal obligations concerning the processing of personal data such as:
 - a. Our obligations and your rights concerning the processing of your personal data
 - b. Defend or prove a legal claim
 - c. Secure the quality and IT-security around Falck's processes and applications

Read more about the purposes in which Falck uses your personal data here

We are collecting and processing your personal information for the following purposes:

1. Securing the correct patient signing, -administration and -identification of you as a patient in First Aid Station Femern.
2. Our clinical examinations, diagnostics, and possible treatment of you, by your inquiry to us in the clinic
3. Our documentation of your examinations, diagnostics, and possible treatments in the patient- and journal systems
4. Receival, collecting and disclosure of necessary patient information in accordance with your examination, investigation, and treatment between internal as well as external health personnel and health professional 3rd parties
5. Accommodation of wishes of disclosing information to 3rd parties such as next of kin, insurance companies, your employer, authorities etc.
6. In order to comply with every law, rule, regulation, legal and binding provision, decision or dictate by a supervisory authority (such as EU's regulation about data protection and other health law etc.) such as:
 - a. Documentation requirements
 - b. Compliance with basic principles for processing of personal data and legal basis for processing
 - c. Implementation and maintenance of technical and organisational security measures, including but not limited to prevent unauthorised access systems and information, prevent receiving or distribution of malicious code, termination of denial-of-service-attacks and damage to computer systems and electronical communication system
 - d. Investigation of a suspected or known security breaches and reporting of such breach to individuals and authorities
 - e. To process and respond to requests and complaints from data subjects and others
 - f. Handling of inspections and requests from authorities
 - g. Management of disputes with data subjects and third parties.

Your personal information will not be shared, sold, or disclosed other than as described in this Privacy Policy.

When we collect personal information directly from you it is necessary in order for us to offer you treatment in First Aid station Femern. You are not obligated to provide the personal information to us. If you do not provide us with the personal information

described below, the consequence will be, that Falck in some cases will be unable to, or provide an inadequate, examination, diagnose and/or treatment.

2. Which personal data is Falck processing about you?

Falck exclusively processes your personal data necessary to meet the purposes described in chapter 1. These information are (in the scope of relevance for you):

- a. Your name and address
- b. Contact information such as telephone number, email etc.
- c. Your social security number 'CPR-number'
- d. Social, familiar, and occupational background, relations etc.
- e. Health information (such as journals, print notes, test results, x-ray/scan results etc.)
- f. Race, ethnic origin
- g. Political belief
- h. Religious belief
- i. Philosophical belief
- j. Sexual orientation
- k. Criminal convictions and offences

Read more about what data Falck is processing about you here

General categories of personal data	Received from
<ul style="list-style-type: none"> • Full name • Address • Relevant contact information such as telephone number, e-mail etc. 	<ul style="list-style-type: none"> • Yourself through contact with the clinic • The Danish Civil Registration System (CPR) in connection with your signing as a patient
Confidential categories of personal data	Received from
<ul style="list-style-type: none"> • CPR-number (Danish Social Security number) 	<ul style="list-style-type: none"> • Yourself through contact with the clinic
<ul style="list-style-type: none"> • Social and familiar backgrounds and relations • Occupational backgrounds • Education 	<ul style="list-style-type: none"> • Yourself through your examination, investigation, and treatment • Other health personnel in the clinic or via electronic lookup in our patient- and journal system
Especially 'sensitive' categories of personal data	Received from
<ul style="list-style-type: none"> • Health information • Race or ethnical origin • Political belief • Religious or philosophical belief • Information regarding sexual orientation or sexual relations 	<ul style="list-style-type: none"> • Yourself through your investigation and treatment • Other health personnel in the clinic or via electronic lookup in our patient- and journal system

3. On what basis and for how long is Falck allowed to process your personal information?

Before Falck is allowed to process your information for the above stated purposes in chapter 1, Falck must first identify the legal basis of the processing of your personal data, including defining how long your personal data is stored with Falck.

According to the General Data Protection regulation Falck is using the following legal basis for the processing of your information:

- a. Legal obligations
- b. Medical diagnosis and treatment
- c. Vital interest
- d. Consent

The legislations used by Falck for the processing and storing is:

- a. The Danish Authorization Act
- b. The Danish Health Act
- c. The Danish Executive Order relating to medical records

Falck will process and store your data in different periods of time according to which law and legal basis being used. **Documentation of patient treatment is stored for minimum 10 years.**

Read more about the basis and for how long your information is processed by Falck here

Description of purpose	Storage- and deletion criteria	Legal basis
Legal documentation such as documentation of handling of your rights requests, storing of data in connection with an ongoing or upcoming trial, investigation of an assumed personal data breach etc.	Data in connection to legal documentation will only be processed and retained with relevance to the claim in question.	Legal obligation (General data protection regulation article 6(1)(c)). Further legal bases depending on the case in question.
Inform the recipients of personal data regarding changes, deletion, or restriction of your personal data, based on your request related to GDPR art. 16, 17(1) and 18.	Documentation of information sent to recipients of your data is retained for 3 years after sent documentation.	Legal obligation (General data protection regulation article 6(1)(c)). Demand for notifications of recipients (General data protection regulation article 19). Limitation period (the statute of limitations §3) Further legal bases depending on the case in question.
Information processed in connection with the patient administration and -treatment. Re-ception, collection and disclosure of necessary patient information in connection with your examination, investigation and treatment between internal as well as external health personnel and health professional 3 rd parties.	10 years from last record in your patient journal acc. to Danish Executive Order relating to medical records § 35. In case of patient information being relevant connecting to a complaint, data will be stored until closure of complaint and thereafter 10 years from last record.	General patient information: General data protection regulation article 6(1)(a), (c), and (d) Sensitive personal information: General data protection regulation article 9(2)(a), and (h)

		<p>Processing of your CPR-number: Danish Data Protection act §11(2)(1)</p> <p>Obligations acc. to patient treatment in way of collecting and disclosure: Danish Authorization act chap. 6 Danish Executive Order relating to medical records §§5-10 Danish Health act chap. 9 §40, 41§, and 42a</p>
<p>Collection and disclosure to health personnel and other 3rd parties outside the clinical treatment.</p>		<p>General patient information: General data protection regulation article 6(1)(a)</p> <p>Processing of your CPR-number: Danish Data Protection act §11(2)(1)</p> <p>Sensitive personal information: General data protection regulation article 9(2)(a) Consent according to the Danish Health act chap. 9 §42d, §42e, §43, and §44</p>
<p>In case of death the information will be disclosed to next of kin, police, patient security etc.</p>		<p>General patient information: General data protection regulation article 6(1)(c)</p> <p>Processing of your CPR-number: Danish Data Protection act §11(2)(1)</p> <p>Sensitive personal information: General data protection regulation article 9(2)(a), and (h)</p> <p>Danish Health act chap 9 §45, §45a</p>

For data processing based on your consent you have a right to withdraw such consent, however this will not affect the processing already incurred prior to withdrawal of the consent.

You can withdraw your consent by contacting the following e-mail: femern@falck.com

4. Automatic, individual decisions

Personal information is not processed for usage of automatic individual decision making nor profiling.

5. Who is Falck sharing your information with?

Falck will, to that extent necessary and in certain cases only with your consent, share information about you to a number of recipients (3rd parties) in order to offer you services based on the purposes stated in chapter 1. These 3rd parties will be independent data controllers responsible for the data processing of your information.

These 3rd parties are: Falck Danmark A/S, other health personnel in patient transportation, hospitals, laboratories, insurance companies, employers etc.

Apart from these 3rd parties Falck will also share your information with a number of suppliers ('data processors') who will process your information based on instruction from Falck. These data processors are primarily located within EU/EØS, but a transfer to countries outside EU/EØS (3rd countries) such as **India** and **USA**, might happen as Falck uses support functions in these countries.

Read more about the parties Falck is sharing your information with here

Your personal information will where relevant be disclosed and shared with the following recipients:

Name	CVR	Address	Country	Purpose
Falck Danmark A/S	16271241	Sydhavnsgade 18	Denmark	Global mother company delivering legal and revision services.
The Danish CPR-register (v/ Ministry of Social Affairs and the Interior)	33962452	Holmens Kanal 22 1060 København K	Denmark	Through CPR references to secure correct address information regarding patient signing/-administration to support patient security.
Hospital (patient transportation, emergency room)	-	-	Denmark	Suggest possible further treatment.
The hospital laboratories	-	-	Denmark	Analysis of reported lab tests.
Region Midtjylland - Clinical quality bases (RKKP)	29190925	Regionshuset Aarhus Hedeager 3 8200 Aarhus N	Denmark	Disclosure to national quality database regarding unintentional incidents, death, vaccination.
The Danish Medicines Agency - Fælles Medicin Kort (FMK)	-	-	Denmark	In connection to ordination/administration of vaccines.
Your insurance company	-	-	-	Disclosure of things such as reparations
Employer	28986564	Vester Søgade 10, 1601 København V	Denmark	Disclosure of things such as work environment cases
Next of kin	-	-	Denmark/EU	In case of death
Police and authorities.	-	-	Denmark	In case of death and according to the law.

Besides the above receivers your personal information will be delivered to our data processors and/or sub data processors, which are:

Name	Category	Country	Sector	Purpose/description
Falck Danmark A/S	Data processor	Denmark	IT	<u>IT</u> Server hosting, IT-supplier and IT support.
HCL Denmark	Data sub-processor	Denmark	IT	HCL is hosting supplier for servers and network infrastructure and offers support
Falck Medycyna	Data sub-processor	Poland	IT	System development, system support, Service desk handling
HCL Poland	Data sub-processor	Poland	IT	Database support
HCL Gothenburg	Data sub-processor	Sweden	IT	Server hosting
HCL Gothenburg	Data sub-processor	Sweden	IT	Server hosting
HCL Noida	Data sub-processor	India (a)	IT	Handling of SharePoint and Office 365
HCL Lucknow	Data sub-processor	India (a)	IT	Handling of SharePoint and Office 365
Microsoft Inc.	Data sub-processor	EU	IT	Server hosting
Microsoft Inc. suppliers	Data sub-processor	Global (a)	IT	Microsoft's suppliers
CompuGroup Medical Danmark A/S	Data processor	Denmark	IT	Server hosting, IT-suppliers and IT support regarding patient system
PLSP A/S	Data sub-processor	Denmark	IT	Developing and hosting of it-systems and it-solutions, including Min Læge app.
MedCom	Data sub-processor	Denmark	IT	Delivery of communication platform, including video consultation and health data network
Region Syddanmark	Data sub-processor	Denmark	IT	Solutions for referrals
TrueCommerce Danmark	Data sub-processor	Denmark	IT	VANS – Communications to and from the clinic to other parts of the health care.
Curanet A/S	Data sub-processor	Denmark	IT	Backup of patient system
Link Mobility A/S	Data sub-processor	Denmark	IT	Supplier of SMS gateway for patient notification mv.

Further information about Microsoft's data processors can be found [here](#).

Further information about the legal base being used to transfer data to 3rd countries can be found here (see reference next to the country in the above tables)

a. EU Standard Contractual Clauses: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_de

6. Your rights

The information being processed by Falck is yours alone. Because of this you have certain rights you can act on in regard to Falck, if you so wish. These rights are such as **i)** insight into what information Falck is processing about you, and **ii)** request Falck to delete the information processed about you. These rights can be limited on account of legal bases and legislations being used to process your data (see chapter 3).

You can exercise your rights by contacting Falck on the named contact information in chapter 7.

You also have a right to lodge a complaint with the supervisory authority in Denmark 'Datatilsynet'.

Read more about your rights here

You have – with the limitations of legislation – among other things:

- **Right to insight in personal information;**
 - You have the right to, free of charge, receive all information which is processed of you in an easily readable and understandable way.
- **Right to correct incorrect information;**
 - You have the right to correct any processed data which is incorrect.
- **Right to deletion of information;**
 - We will, upon your request, delete all or specific data we process about you, should we not have a legal basis for continual processing of your data.
- **Right to limit the processing of information;**
 - You have the right to restrict the access to the data, resulting in the data cannot be processed for any purpose besides storage, unless we can justify continued processing.
- **Right to data portability;**
 - You have the right to receive the information processed by you in a structured, commonly used and machine-readable format.
- **Right to object the processing of personal information, hereunder individual verdicts;**
 - You have the right to object to a data processing, either entire processing or parts of the processing, where after we cannot continue process the data, unless we can demonstrate a legal basis for the processing, which overrides the objection. This includes objection against any processing including automated and individual decision-making, should this occur.

7. Contact details

If you have any questions or comments in regard to the treatment of your personal data, or if you wish to act on your rights in accordance with the law, you are asked to please contact us on femern@falck.com. You can also contact our data protection advisor by sending an email to dpo@falck.com.

Falck Healthcare A/S
Sydhavnsgade 18
2450 København SV
Danmark

8. Version history

A need to update the processes might occur related to First Aid Station Femern, where changes to this privacy policy might occur. These updates will be controlled versions, as seen here.

Your version will always be the newest on the table.

Date of change	Version	Changes
04.01.2022	1.00	First message about data processing ready for use.