

Operating model for preventive healthcare: consent and information

Harjunterveys seeks to provide highest quality care with high effectiveness. Our goal is to automatically identify patients who, for example, have a poorly controlled chronic disease or laboratory test results that significantly differ from the goals of their treatment. To use this preventive operating model in your care, we need your consent, which is explained below (you can find more details after the consent requests).

Consent to the automated use of data stored in the patient register of the wellbeing services county of Päijät-Häme in your treatment

Our goal is to automatically analyse patient, health and well-being data to promote our customers' health, prevent diseases, accidents and other health problems, and to strengthen mental health. In addition, we aim to reduce health disparities between population groups. Based on the data, we aim to predict your need for healthcare services, for example.

This activity partially falls under 'profiling' according to EU's General Data Protection Regulation (679/2016, "GDPR"), as this operating model includes assessing and anticipating risk factors related to the health of our customers as well as the automated processing of personal data.

In order to carry out the profiling included in the operating model described above and to form automated individual decisions, **we need explicit consent from you for profiling, automated decision-making and contacting you.** Your consent to be contacted is necessary so that a professional can contact you if health risks or deviations are detected as a result of the processing of personal data. Your consent to be contacted is also necessary because the information provided in the consent form may later need to be updated. In the future, we may need to ask you for new consents to the processing of your personal data.

Profiling activities that lead to a further examination based on a risk assessment do not directly lead to treatment decisions. **Treatment decisions are made by a healthcare professional in agreement with you.** If the profiling activities do not lead to a professional examining your information and contacting you, the processing may be interpreted as automated decision-making, for which we need your consent. However, an automated decision is not a treatment decision. Automated decision-making will not affect your normal right to treatment later.

The consents you give will be valid for ten years from the moment of giving your consent, during which time your personal data may be processed as described in this consent form on the basis of your consent. (For more information, see "**More information about the processing of personal data, profiling and automated decision-making**")

You can withdraw your consent at any time. You can change your consent later in the Asetukset ('Settings') section of the app or by using a paper form at Harjunterveys locations, for example.

Your participation is voluntary. You may refuse to participate in the risk data analysis. You may also suspend your participation or withdraw your consent at any time without giving any reason. This will not affect the way you are treated or your right to receive the treatment you need. **Services may not be denied or removed from you on the basis of automated decision-making or profiling.** Instead, the purpose of automated processing is to provide additional health benefits and to implement treatment and patient selection in accordance with national treatment practices at all times.

By giving your consent, you confirm that you have read and understood the information you have received and that you have received sufficient information about the risk analysis described in this consent form and the processing of personal data carried out in connection with it.

Processing of health and well-being data, profiling and automated decision-making to improve the quality, effectiveness and availability of care

1. Consent to profiling

I consent to the processing of my data stored in the patient register of the wellbeing services county of Päijät-Häme as described above for the purposes of profiling to improve the quality, effectiveness and availability of care.

Yes. No.

2. Consent to automated decision-making

I consent to automated decision-making as described above, in other words to the use of my data stored in the register of the wellbeing services county of Päijät-Häme to form automated individual decisions.

Yes. No.

3. Consent to be contacted

I consent to be contacted as described above, in other words I may be contacted if health risks or deviations are detected as a result of the processing of personal data, it is necessary to update the information provided in connection with the request for consent or it is necessary to request new consent from me for the processing of personal data.

Yes. No.

Date & place

Signature

Personal identity code

Name in clear print

More information about the processing of personal data, profiling and automated decision-making

Profiling of health and well-being data and automated decision-making to improve the quality, effectiveness and availability of care

We automatically analyse patient, health, and well-being data to promote your health, prevent diseases, accidents, and other health problems, and strengthen mental health, as well as to reduce health disparities between population groups and systematically allocate resources in a health-promoting manner. Our goal is to increase the health and well-being of our customers, prevent the outbreak and progression of diseases and develop the equality of the healthcare system.

Profiling activities and automated decision-making do not directly lead to treatment decisions. Instead, treatment decisions are made by a healthcare professional in agreement with you. The results of the analysis are only used by the healthcare services of the wellbeing services county of Päijät-Häme and are not disclosed to third parties. An exception is made if you have consented to the disclosure of your data or if the disclosure is based on legislation.

You have the right to refuse profiling activities, automated decision-making and contacts directed at you by withdrawing your consent at any time. You can withdraw your consent in the Asetukset ('Settings') section of the app, by using a paper form at Harjun terveys locations or as otherwise described in the privacy policy of the wellbeing services county of Päijät-Häme.

Please note that withdrawing your consent will not affect the risk analyses or other processing of personal data already carried out on the basis of your consent. In addition, no risk analysis is carried out if you give your consent only for profiling, automated decision-making or contacting you, as all consents are required for the processing described. This operating model can only be implemented if consent has been expressly given for each of the aforementioned points.

Detailed description of profiling activities, automated decision-making and analyses:

Definitions of profiling and automated decision-making in the processing of data can be found on the website of the Office of the Data Protection Ombudsman (<https://tietosuoja.fi/en/automated-decision-making-and-profiling>).

The computer server connected to the repositories runs programmes and calculation formulas that perform automated analyses, arrangements and checks. The patient and well-being data processed on the server are protected by a code key, which, based on your consent, consists of no more than the data that is in the patient register of the wellbeing services county of Päijät-Häme. Based on the data, we aim to identify your risk of an increased need for healthcare services at the time of the analysis, for example. Based on these analyses, we aim to offer you timely and necessary healthcare services as part of your public healthcare, based on the analysis.

The limit for the occurrence and absence of risk is a threshold or a set of thresholds commonly accepted in medicine and/or produced by an algorithm developed in cooperation with physicians.

Your data may, for example, be compared to values in accordance with Current Care Guidelines, other medical evidence or threshold values generated by the algorithm. The rules are always defined in cooperation with medical professionals. An example of such a case is the comparison "Diabetes type 2 diagnosis AND no use of services for over 1 year". In this case, the increased risk of need for healthcare services or illness can be indicated by computer-assisted means, for example.

The activity described above partially falls under 'profiling' according to EU's General Data Protection Regulation ("GDPR"), as it includes assessing and anticipating risk factors related to your health as well as the automated processing of personal data. For example, the analysis of the data may or may not show that your risk of need for healthcare services has increased. The fact that the analysis of the data did not reveal a risk of an increased need for healthcare services does not eliminate the possibility of a risk. Therefore, under no circumstances does the analysis of data guarantee that we will identify diseases or the risk of contracting a disease.

In cases where the analysis of the data does not identify an increased risk (for example, the analysis does not show an increased need for healthcare services, the register of the wellbeing services county of Päijät-Häme does not have any health data concerning you that could be analysed or only part of your health data has been used in the analysis), your data will not be sent to a professional for further examination or contact. In these situations, automated individual decisions may be formed, as the automated analysis has not raised the risk of an increased need for care. However, you have the right and opportunity to receive public healthcare services, regardless of the result of the automated analysis of your data.

Profiling and automated decision-making cannot lead to the poorer effectiveness and availability of health services. Instead, this operating model aims to offer additional health benefits and implement treatment and patient selection in accordance with national treatment practices at all times.

You have the right not to be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you ("automated decision-making"), unless the decision is based, for example, on your explicit consent. We would like to emphasise that participation in the operating model described here is completely voluntary and you can withdraw your consent at any time in the ways described above.

Contacting you based on data observations

If the computer-assisted analysis raises the risk of an increased need for healthcare services, a medical professional carries out a risk assessment on the basis of the data in the register. If risks, deviations, insufficient treatment or test results above reference values are then observed in your data, your data may be communicated in the digital treatment environment to the healthcare professional treating you with this prior consent. You may then be contacted via an electronic app, telephone call, letter or SMS. This way, you can be treated in line with the best practices before the illness gets worse.

Your data can be combined within the system in such a way that your treatment needs and treatment urgency can be modelled based on medical data (so-called profiling), and the best treatment package and schedule can be planned for you. The purpose of using personal data is to produce health benefits and improve the quality of healthcare services for the customers of Harjunterveys.

Services may not be denied or removed from you on the basis of automated analysis or profiling. Instead, the purpose of automated processing is to provide additional health benefits and to implement treatment and patient selection in accordance with national treatment practices at all times.

Consent for contacting you or a lack of consent does not affect other contacts, for example, for purposes of your treatment.

In addition, the information provided in this consent form may need to be updated later, or we may need to ask you for new consents to the processing of your personal data in the future, for example, if the consent is about to expire and we need new consent from you.

For the reasons described above, we also ask for your consent for us to contact you.