

PRIVACY POLICY

1. Data controller	Name: Mediracer Oy/Ltd. Address: Rantakatu 4, 90100 Oulu, Finland Contact: Tel. +358458992626, email: info@mediracer.com
2. Contact person for data-related matters	Name: Lassi Laitinen Tel.: +358 400 148 881 Email: lassi.laitinen@mediracer.com
3. Name of register	Mediracer Service Center (MSC) and CRM
4. Legal Basis and Purpose of Processing Personal Data	<p>The processing of personal data is based on (i) performance of the rights and obligations of a lease and/or service agreement between a controller and a customer, or a data controller and its partner, for a supplier agreement, and performance of the preliminary measures required for the agreement, (ii) and/or for the purposes of the legitimate interests of the controller or of a company belonging to the same group.</p> <p>Personal data is used for providing medical reports, handling orders and invoicing, managing, developing and maintaining the customer (including potential customer) relationship between the controller and the customer, and the related analysis, compilation of statistics, customer communication, organizing of events, customer experience evaluation, identification of the customer's users, user management, troubleshooting of electronic services, and management of relationships between the cooperation partners. In addition, personal data is used for direct marketing by the controller and its group companies (including electronic newsletters), targeting and profiling of online advertising, and for designing and development of the controller's products and services.</p>
5. Data Content of the Register	<p>Decision-makers and contact persons of current and potential customers, suppliers and partners of the controller, and newsletter subscribers.</p> <p>CRM register may contain the following personal data.</p> <ul style="list-style-type: none"> • Name • Email • Work telephone number <p>Mediracer Service Center medical report contains the following personal data:</p> <ul style="list-style-type: none"> • Patient name • Patient ID • Name and organisation for the orderer of the medical report <p>Mediracer Service Center patient database may contain the following personal data:</p> <ul style="list-style-type: none"> • First name • Last name

	<ul style="list-style-type: none"> • Date of birth • Patient ID • Gender • Height • Weight • Handedness • Condition of diabetes <p>With some cases also other health related personal data may be registered if they are considered to have an impact on the patient's clinical diagnosis.</p>
6. Regular Sources of Data	<p>Data is collected regularly about the data subject by telephone, email, on the internet, in meetings, and in conjunction with concluding agreements and contractual relations and patient data sent by the customers of the Controller. Personal data can also be collected and updated from public and private registers, such as the population register, other authorities, credit information companies, contact information providers, and other similar trustworthy parties.</p>
7. Data Storage Period	<p>Personal data is stored for as long as it is necessary for fulfilling the purpose of the personal data. As a rule, the data are kept for the full duration of the customer or partnership relationship.</p> <p>For Patient register the storage period is six (6) months, unless agreed otherwise with a customer.</p>
8. Regular Disclosure and Transfer of Data	<p>The controller does not regularly disclose the registered data to third parties.</p> <p>Personal data may be disclosed and transferred to the subsidiaries and subcontractors of the Controller for their use. Such companies are listed at the end of this document.</p> <p>Anonymous patient data may be used for research purposes.</p>
9. Data Transfer Outside the EU or EEA	<p>None of the personal data contained in this policy will be processed outside the EU and the EEA. Patient register data is only available for the sending organisation in their country inside or outside the EU.</p>
10. Principles of Registry Protection	<p>A. Manual material Register does not generate manual material.</p> <p>B. ADP processable data Personal data and patient data are collected in databases that are protected by firewalls, passwords, and other technical measures. Databases and backups are stored in data server provided by Planeetta Internet Oy and located in Helsinki, Finland in locked spaces, and only certain pre-designated persons can access them.</p>

	<p>The only persons who have access rights to the personal data system are those employees of the controller who have the right to process personal data contained in this register for the purposes of carrying out their work. Each user has their own username and password for the system</p>
<p>11. Rights of the Data Subjects</p>	<p>A. Right to access the data According to the article 15 of EU 2016/679 the data subject has the right to inspect the data on him or her that is stored in the register. Such request must be submitted in writing personally to the Controller's contact person mentioned in section 2.</p> <p>B. Right to complain to authorities According to the article 77 or EU 2016/679 the data subject has the right to object or request restriction of processing of the subject's data, and to file a complaint against the processing of their personal data to the relevant supervisory authority.</p> <p>C. Right to demand data correction According to the article 16 of EU 2016/679 the data subject has the right to demand that any incorrect data be corrected. Such request must be submitted in writing personally to the Controller's contact person mentioned in section 2.</p> <p>D. Right to remove data According to the article 17 of EU 2016/679 the data subject has the right to demand that any data on him or her be deleted from the register. Such request must be submitted in writing personally to the Controller's contact person mentioned in section 2.</p> <p>E. Right to transfer data from one system to another According to the article 20 of EU 2016/679 the data subject has the right to demand their personal data moved from one system to another, provided that the processing is based on consent or contract and it is done automatically. The data subject also has a right to have their personal data transferred from one Data Controller to another, provided that it is technically feasible. Such request must be submitted in writing personally to the Controller's contact person mentioned in section 2. The right to transfer data from a system to another is not applied with legal registers.</p>
<p>12. Data Controllers</p>	<p>Mediracer Oy/Ltd., Mediracer UK Ltd., Netproce Oy and ProWellness Health Solutions Oy.</p>