

Privacy statement

Communication Center Kipinä ("Kipinä Center") is a speech therapy provider committed to upholding the highest standards of data protection in processing the personal data of persons it encounters in the course of its activities. The purpose of this privacy statement is to provide customers, purchasers and other persons interested in Kipinä Center's activities a comprehensive picture of its principles of processing personal data.

Official company details

Kommunikointikeskus Kipinä Oy

Malmin raitti 17
00700 Helsinki

Email: info@kipinakeskus.fi

Business ID: 2514251-5

For what purposes does Kipinä Center collect personal data?

Kipinä Center processes personal data only for predefined purposes. These purposes vary from contact details collected on visitors to the website to our customers' rehabilitation treatment plans. However, we always have a transparent legal basis for processing and employ clear principles for data protection.

Personal data collected by Kipinä Center is divided into four categories, depending on their purpose of use:

- 1) Data collected in order to provide our offered services, manage customer relationships and provide rehabilitation (**Customer data**);
- 2) Data collected in order to manage customer relationships, deliver ordered services/products and handle invoicing (**Purchaser data**);
- 3) Data processed in order to communicate and market the offered services and products (**Marketing data**); and
- 4) Data collected automatically for the purpose of providing and developing Kipinä Center's online services (**User data**).

Data may be processed for the purpose of developing Kipinä Center's services and its related research activities.

What types of personal data do we collect?

We collect only those types of personal data that is necessary for each separate purpose. This section lists detailed information on the categories of personal data that we may collect for each purpose.

Customer data collected from customers

Only information necessary for providing rehabilitation is collected from persons attending rehabilitation treatment at Kipinä Center. The following categories of personal may be collected from customers:

- ✓ name, date of birth and contact details;
- ✓ diagnoses relevant for providing rehabilitation;
- ✓ in the case of underage patients, the name and contact details of guardians or other legal representative, and the name and contact details of a possible legal representative appointed for an adult patient;

- ✓ name, possible family relation and contact details of a next of kin or other contact person named by the customer;
- ✓ the customer's native or preferred language;
- ✓ the customer's profession;
- ✓ the customer's employer's insurance provider, in the possible event of an occupational injury or illness, or the customer's insurance provider if the treatment may be compensated by insurance; and
- ✓ the patient's consent to the disclosure of personal data.

Customer data may also contain the person's patient records and their related information:

- ✓ the patient record and its related documents, including decisions, payment commitments, referrals, examination documents and opinions, consultation responses, opinions issued on the basis of examination or therapy; and
- ✓ other information and documents collected or received in the course of arranging and providing rehabilitation, various appointment and patient diaries, lists and card indices, IT recordings and audio, photograph and video recordings.

Purchaser data collected from purchasers

Kipinä Center will collect only information necessary for delivery of the purchased product or service. Purchaser data may include the following personal data about purchasers:

- ✓ name;
- ✓ contact details;
- ✓ profession/position within company;
- ✓ information about the purchased product or service and their delivery; and
- ✓ billing information.

Marketing data collected for marketing purposes

Kipinä Center collects only the most essential personal data from customers and purchasers for marketing purposes. Data processed for marketing purposes are collected in a separate Marketing register and may include the following types of data:

- ✓ name;
- ✓ contact details;
- ✓ profession; and
- ✓ information about what products or services the person is interested.

User data collected by the online service and electronic tools

As part of its activities, Kipinä Center uses electronic tools to collect user data, mainly related to user behaviour in various electronic channels. Kipinä Center is committed to using only those tools that collect User data that are provided by service providers that comply with data protection legislation in force within the European Union.

For example, for its website analytics, Kipinä Center uses the Google Analytics tool, which collects anonymous data on the website's users and their behaviour on the site. Google Analytics uses cookies to collect the data. More information on how these cookies work and the types of data they collect is provided in the next section. More about the Google Analytics tool: <https://analytics.google.com/analytics/web/>. Kipinä Center also uses Facebook Pixel to target marketing. More about the Facebook Pixel: <https://www.facebook.com/business/learn/facebook-ads-pixel>.

In its electronic communications, Kipinä Center uses the MailChimp email service, which may collect the following personal data:

- ✓ information on opening emails and links;
- ✓ information on the recipient's most frequently used email application; and
- ✓ language and location data.

More about the MailChimp service: <https://mailchimp.com/>.

In addition, Kipinä Center may, in providing its services, use various questionnaire services and other electronic tools that collect User data for a clearly specified purpose and for statistical purposes. Kipinä Center is committed to using only tools that comply with a high standard of data protection in processing personal data.

Cookies

Cookies are small text files used by websites to identify users on their initial and subsequent visits. Cookies are stored on the user's device, and their use may be permitted or refused from the browser settings on the user's computer or other device.

Cookies are used to collect the following information, for example:

- ✓ the user's IP address
- ✓ time of visit
- ✓ pages visited and time spent on them
- ✓ type of browser and operating system
- ✓ the web address from which the user arrived on the website, and the web address to which the user moved from the site
- ✓ the server and domain from which the user arrived on the website

Cookies enable the tools used by Kipinä Center to identify the user's browser and use this information to calculate the number of visitors to the website and track the website's statistics, for example. The main purpose of cookies is to collect data for analysis on the amount of website traffic and the behaviour of visitors on the website. The results of this analysis are used actively in developing the website.

How long are personal data stored?

The storage period of personal data depends on the purpose for which they were collected. Some types of data are subject to legal requirements, in which case the retention periods of the data are determined directly by legislation in force at the time.

In the case of Customer data, the retention periods of personal data are determined based on the requirements of legislation in force, such as the Ministry of Social Affairs and Health Decree on patient documents.

In the case of Purchaser data, personal data are retained for as long as is necessary for managing licences for the products and evaluating training needs related to the purchase of products.

Marketing data are retained for as long as the controller uses the data for marketing purposes. The legal basis and need for processing are reassessed at least once every two years. Data subjects have the right to request the erasure of their personal data from the Marketing register at any time.

Who has access to the data, and how are personal data safeguarded?

Kipinä Center takes the safeguarding of personal data very seriously. Personal data is kept confidential and stored in a secure environment. All processed data are safeguarded by technical and organisational measures. In practice, this means that the technical systems we use are protected by appropriate technical information security solutions, and the data is accessed by a limited number of individuals who have received the appropriate training and instruction.

Documents that contain personal customer, vendor and marketing data in a manual format are stored on the premises of Communication Center Kipinä in locked cabinets and accessible only to employees with the right and need to process the data as part of their duties.

Similarly, systems that contain personal data in an electronic format are accessible only to employees who have the right to process Customer data as part of their duties. Users are issued personal usernames and passwords to the systems. The data are collected on servers that are safeguarded by a password, firewall and other technical measures. The servers and their backups are stored on locked premises and their data accessible only by certain employees designated in advance who have the right to process the data as part of their duties.

Personal data stored in the customer register must be kept confidential by law, and all employees of Communication Center Kipinä are bound by an obligation of secrecy.

How are data collected and what is the legal basis for collection?

All categories of personal data are primarily collected from data subjects themselves and in the course of daily activities carried out by Kipinä Center.

Customer data are collected from:

- ✓ data subjects or their guardians;
- ✓ speech therapy services provided by Communication Center Kipinä; and
- ✓ third parties providing treatment to the customer (this requires the customer or their guardian to grant written consent to the request and disclosure of data).

The right of Kipinä Center to process personal data is based on the performance of the customer relationship contract and the statutory obligations of Kipinä Center. Customer data will never be processed without the customer's consent in cases where consent must be obtained by law before processing data.

Purchaser data are collected from data subjects themselves when purchasing a service or product. The right to collect, retain and archive Purchaser data is based on the performance of the purchase agreement.

Marketing data are collected from data subjects themselves on the basis of prior consent granted upon collection. Marketing data can be also collected from public sources. For those data subjects in the marketing register who have not granted prior consent, the principles of direct marketing shall apply to marketing activities, whereby the right of companies, organisations and public sector representatives have the right to process personal data on the basis of the legitimate interests of the controller.

The basis for collecting User data is the consent of data subjects and the legitimate interest of the controller. Users may, at any time, refuse the processing of their data in their device's browser settings or by refraining from using the services provided by the controller. User data will not be used for automated decision-making.

Are personal data disclosed to third parties?

As a rule, Customer data will not be disclosed to parties outside Communication Center Kipinä, with the exception of the Customer and his or her guardian or other legal representative. However, with the separate consent of the Customer or his or her guardian, personal data may be disclosed to parties responsible for the Customer's rehabilitation plan, the speech therapist providing the rehabilitation, and the party billed for the Customer's rehabilitation.

Customer data are disclosed for storage in the patient information system used by Kipinä Center and the national Kanta system.

As a rule, Purchaser and Marketing data are not disclosed outside Communication Center Kipinä, with the exception of information system used by Kipinä Center and to service providers necessary for the fulfilment of statutory obligations, such as an accounting firm. Additionally, Purchaser and Marketing data may be processed by Kipinä Center's partners,

such as resellers. These partners process personal data only commissioned by and behalf of Kipinä Center. Kipinä Center ensures that its service providers comply with the principles of personal data processing by means of separate data processing agreements.

Transfer of data outside the EU or EEA

Customer and Purchaser data will not be transferred outside the EU or EEA.

In the case of Marketing data, however, it should be noted that in its direct marketing activities, Kipinä Center uses the MailChimp email service, which is physically located outside the EU. Data is transferred based on Europe's Commission's Standard Contractual Clauses (SCC). For detailed information on MailChimp's privacy policy, visit: <https://mailchimp.com/legal/privacy/>.

Rights of data subjects

Data subjects have extensive rights in influencing the processing of their personal data.

Data subjects have the right to access personal data collected about them and the right to request inaccurate information to be rectified. Requests for access and rectification must be made in writing and signed and sent to the address indicated at the top of this privacy statement. The request must provide reasons and specify which data is requested to be accessed or rectified.

Data subjects also have the following statutory rights, among others:

- ✓ the right to transfer data to another controller after granting separate consent to the transfer of data;
- ✓ the right to object to processing and the right to restrict processing on legal grounds;
- ✓ the right to withdraw consent to the processing of personal data; and
- ✓ the right to request the erasure of their data.

Data subjects also have the right to lodge a complaint with the supervisory authority if they feel that the processing of their personal data has violated the EU General Data Protection Regulation or other legislation on the processing of personal data in force. For more information and instructions by the supervisory authority, visit: <https://tietosuoja.fi/en/private-persons>.

In the case of Marketing data, data subjects have the right to object to the processing of their personal data by the controller for the purposes of direct marketing, distance sales and market survey, opinion polling or other research. Objections to processing may be made at any time to the Kipinä Center Data Protection Officer.

Amendments

Kipinä Center is committed to upholding its level of data protection in the future and will update this Privacy Statement as necessary. We therefore recommend that you periodically revisit the content of this Privacy Statement.