

# Privacy policy - Patients and their relatives

July 2024

## Background

DIGNITY - Danish Institute against Torture (hereinafter "DIGNITY", "we", "us", "our") may process your personal data, when you are a patient or relative of a patient, who is undergoing treatment in our clinic. Therefore, it is our duty to provide you with information about how we process your personal data.

Below you can see the purposes for which we may process your personal data and the rules in the General Data Protection Regulation (EU/2016/679) (hereinafter "GDPR") and the Data Protection Act (Act no. 502 of 23 May 2018) (hereinafter "DPA") that form the legal basis for our processing. You can also read more about your rights.

If you have any questions about this privacy policy, you are always welcome to contact us by email at [gdpr@dignity.dk](mailto:gdpr@dignity.dk) or by phone on +45 33 76 06 06 00.

## How we process personal data about patients

We process your personal data when you are a patient in DIGNITY's clinic.

We process the data which you provide us with during your treatment programme. We may also process information about you that originates from other treatment centers. For example, through access to your E-journal, we can obtain relevant health information about previous treatments. With your consent, we can obtain personal data about you from public authorities, schools, day care centers, etc. where we may also receive information about, for example, personal and family circumstances, as well as social and financial circumstances.

Our processing of your personal data is necessary for us to be able to provide you with the right healthcare treatment, including the right examination, diagnosis, treatment, health promotion, etc. and for us to comply with relevant legislation, especially the Health Act "Sundhedsloven", the Authorisation Act "Authorisationsloven", the Executive Order on Record Keeping "Journalføringsbekendtgørelsen", etc.

DIGNITY may disclose information about you to others, with your consent, when relevant; for example, to your relatives to inform them about your treatment, or to the social authorities (job center, social center, or citizen service) so that they can help you with work, housing, or other relevant things. DIGNITY may also obtain information about you, with your consent, when DIGNITY needs information from the medical record to conduct research into the treatment, so we can become even better at knowing which treatment works best for whom.

DIGNITY has an increased obligation to notify "Underretningspligt", which means that we are obliged to pass on information about children and young people to the person's municipality of residence, if we are made aware of any circumstances which gives us reason to assume, that

the child or young person needs special support. DIGNITY may therefore disclose information about children and young people without your consent in such cases.

We store your personal data in accordance with the rules in the Executive Order on Record Keeping. This means that your personal data is registered in your patient record and stored for 10 years from the last entry in the record. In the event of any complaints, supervision or compensation cases, your patient record may be stored for a longer period if the case is still pending after the 10-year storage period has expired.

#### **The legal basis for our processing of your personal data**

- Your valid consent in connection with the collection and disclosure of your personal data, cf. GDPR, art. 6(1)(a) and art. 9(2)(a), cf. Chapter 9 of the Health Act.
- Our legal obligation to record information about you and keep your medical records, cf. GDPR, Art. 6(1)(c) and Art. 9(2)(h)
- To be able to carry out health treatment, cf. GDPR, Art. 9(2)(h), cf. Art. (6)(1)(e)

## **Our processing of personal data about relatives**

In certain cases, we may process your personal data when you are a relative of a patient in DIGNITY's clinic.

We process the information about you, which you or the patient, has given us in connection with the patient's course of treatment at our clinic. Generally, this will be information such as your name, family relationship to the patient, contact information and possibly your social security number. In some cases, it may be necessary for the course of treatment to register additional information about you in the patient record.

Our processing of your personal data is necessary for us to be able to register family relationships, e.g. the custodial parent in the case of minor patients, and in cases where the patient has given us consent to disclose personal data about themselves to you as a relative.

We store your personal data in accordance with the rules in the Executive Order on Record Keeping. This means that your personal data - if it is registered in the patient's medical record - is stored for 10 years from the last entry in the record. In the event of any complaints, supervision or compensation cases, the patient record may be stored for a longer period if the case is still pending after the 10-year storage period has expired.

#### **The legal basis for our processing of your personal data**

- Our legal obligation to retain patient records, cf. GDPR, Art. 6(1)(c) and Art. 9(2)(h)
- To be able to carry out health treatment, cf. GDPR, Art. 9(2)(h), cf. Art. (6)(1)(e)

## Your rights

You have several rights under data protection rules. Please note that in some cases your rights may be limited. If you wish to make use of your rights or learn more about any restrictions on your rights, you are welcome to contact us.

Your rights include the following:

- **Right of access:** You have the right to request access to the data we process about you.
- **Right to rectification:** You have the right to request that we correct incorrect information about you.
- **Right to erasure:** You have the right to request that we erase information about you.
- **Right to restriction:** You have the right to make us restrict our processing of your personal data.
- **Right to object:** You have the right to raise objections to our processing of your personal data.
- **Right to data portability:** You have the right to ask to have your personal data transferred to others.
- **Right to withdraw your consent:** When we process your data based on your valid consent, you have the right to withdraw your consent at any time. If you choose to withdraw your consent, it will not affect the legality of our processing of your personal data based on your previously given consent and up to the time of withdrawal. Therefore, if you withdraw your consent, it will only take effect from that time.

You can read more about your rights in the Danish Data Protection Agency's (Datatilsynet's) guide on data subject rights, which you can find at [www.datatilsynet.dk](http://www.datatilsynet.dk).

You have the right to file a complaint with the Danish Data Protection Agency at any time if you are dissatisfied with the way we process your personal data. You can find the Danish Data Protection Agency's contact details at [www.datatilsynet.dk](http://www.datatilsynet.dk).

## DIGNITY's contact details

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