

D.03.ORG - PIN Patient traveling to Greece

eHealth Digital Service Infrastructure Patient Information Notice

Patient is traveling to GREECE

1. Purpose of Patient Information Notice

In accordance with the obligations laid down in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), this notice aims to inform the patients (European residents) travelling to Greece in a concise, transparent, intelligible and self-explanatory manner about the processing of their personal data by health care professionals which takes place in a cross-border setting.

2. What is the eHealth Digital Health Service Infrastructure?

The European Digital e-Health Services Infrastructure (eHDSI or eHealth DSI) provides healthcare professionals involved in the treatment and / or distribution of medicines with secure and easy access to the medical data of European Union (EU) residents. The eHDSI is a cross-border electronic system that offers European residents, in accordance with the legal provisions laid down by the GDPR and the relevant national and EU legislation, a secure and simple means of transferring their health data in case they need to make use of healthcare provision services abroad, through a secure digital gateway provided by a National Contact Point for eHealth (NCPeH) as designated by each country. The patient's personal data are processed in accordance with the national law provisions of the country of treatment.

3. Which categories of data are processed?

The medical data that compose your patient summary as well as those included in your e-prescriptions and e-dispensations are collected and processed in your country of residence, are made available to health care professionals in Greece, in order to enable you to benefit from Cross-border provision of health services in Greece. The data that will be made available can be divided into two (2) main categories:

- Demographic data, such as the patient's contact details, identification form number etc, which are being used for identification purposes, and

- Special categories of data, such as medical data contained in the patient summary, as well as those included in your e-prescriptions and e-dispensations, which are transferred through eHDSI.

The above includes all health data relating to the patient which are accessed for the purpose of provision of health care services in Greece. The only condition is that your personal data are already registered in electronic form in your country of residence. In addition to the data accessed from your country of residence, health data may be collected on site and stored in electronic or paper format at the point of provision of health care. This data will be processed in accordance with the relevant national and EU legislation.

4. On what grounds is your personal data processed?

The legal basis for the processing of personal data ,such as demographic/ identification data and contact details is Article 6 par. 1 (c) and (e) of GDPR (“*processing is necessary for compliance with a legal obligation to which the controller is subject*” and “*processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller*”).

The legal basis for the processing of special categories of data (e.g. health data) is Article 9 par. 2 (h) and (i) of GDPR (“*processing is necessary for the purposes of preventive or occupational medicine..., medical diagnosis, the provision of health or social care or treatment...*” and “*processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care.*”)

In addition, your personal data is processed in accordance with the provisions of:

- the applicable national legislation of Greece (L.4213 / 2013, in combination with the provisions of L.3418 / 2005, L.3892 / 2010, articles 83, 84 of L.4600 / 2019 and article 28 of L.4913/2022, as they may be amended and apply).
- the Agreement between National Authorities or National Organisations responsible for National Contact Points for eHealth on the Criteria required for the participation in Cross-Border eHealth Information Systems.

5. For which purpose is your personal data processed?

Your personal data will be processed solely for the purpose of the provision of cross-border health care services, e.g. medical treatment and/or provision of medicines. In Greece, your data may be also used for the purpose of carrying out epidemiological, statistical, financial, administrative and management analysis in order to improve the health indicators and the quality of the services provided. In such a case your data is anonymized. This processing is regulated by Greek Law 4487/2017 (Reform of Primary Health Care, urgent regulations under the Ministry of Health and other provisions) and articles 5 par. 1(b), 9 par. 2(j) and Recital 89 of the GDPR.

6. Who has access to your data?

The Greek Ministry of Health is acting as data controller, whereas IDIKA S.A. (E-Government of Social Security S.A.) acts as data processor on the data controller's behalf. Your data will only be made accessible to the authorised health care professionals in Greece who are involved in your treatment or in the provision of medicines and are bound by the relevant legislation and Codes of Ethics with regards to professional confidentiality obligations and personal data processing. Greece has undertaken to ensure that all healthcare professionals in its territory are adequately trained and professionally equipped to fulfil their obligations related to the eHDSI services. Finally, the data included in the patient summary will be accessible through a secure digital gateway provided by the eHDSI participating countries.

7. Where are personal data stored and for how long?

Your data will be stored in the information systems of the organisations that process the data, both in your country of residence and Greece. Personal data may be stored only for as long as it is necessary for the purposes for which it is being processed as well as according to relevant provisions of the applicable national legislation on health data retention. Furthermore, data may be stored for longer periods only for archiving purposes in the public interest and scientific or historical research purposes while particular privacy safeguards are in place (anonymisation).

8. Your rights

With regard to the processing of your personal data for the purpose of the provision of cross-border health services, you may:

- exercise your right to information and access to your data
- request the correction of any inaccurate data in accordance with Article 16 of GDPR.

In case the special conditions set by GDPR and the applicable national legislation on personal data protection are met, you may also:

- request the erasure of your data in accordance with Article 17 of GDPR,
- object to the processing of your data in accordance with Article 21 of GDPR.

You have the right to appeal to the Greek Data Protection Authority for issues related to the processing of your personal data performed in Greece. Regarding the competence of the Authority and the procedure for the submission of complaint, detailed information is provided on the website <http://www.dpa.gr>.

9. Contact information

Data Controller:

Ministry of Health - Division of Electronic Governance [email: myHealthEU@moh.gov.gr]

Ministry of Health - Data Protection Officer (DPO) [email: dpo@moh.gov.gr]

Data Processor:

IDIKA S.A. - Service Desk [email: servicedesk@ncpehealth.gr]

IDIKA S.A. - Data Protection Officer (DPO) [email: dpo@idika.gr]