

## CONDITIONS OF USE FOR CITIZEN SERVICES ON Helsenorge

Helsenorge is the public health portal for citizens of Norway who wish to use digital services in the health and care sector.

Below, you can read about how your personal data will be processed and safeguarded when you use the services on our log-in pages. If you have any questions about the conditions of use or the processing of your personal data, you can contact the Norwegian Health Network (Norsk Helsenett, NHN) via the contact form at [helsenorge.no](https://helsenorge.no) or by telephone on 23 32 70 00.

### 1 Conditions of use and data responsibility

The conditions of use describe the processing that NHN will carry out on your personal data when you log in to Helsenorge. This processing will take place in accordance with the statutory requirements that apply to the processing of personal data. In the health and care sector in Norway, the Norwegian term for controller (*dataansvarlig*) is used instead of the normal term for processor (*behandlingsansvarlig*), as the latter term could be interpreted in Norwegian as referring to the party that is responsible for the provision of treatment.

With some exceptions, NHN is the controller regarding the processing of your personal data on Helsenorge. **Controller** means the party that determines the purpose of the processing of personal data and the tools that are to be used. The organisations that you have a dialogue and interact with are the controllers with regard to data that is stored in their internal systems. If you use services where an organisation other than NHN is the controller, you will be informed of this.

NHN is the processor with regard to services that give direct access to personal data that is registered by other organisations. **Processor** is a party that processes data on behalf of a controller. NHN is also the processor when we manage other controllers' consents and opt-outs on Helsenorge.

## 2 Purpose

The purpose of the login services on Helsenorge is to facilitate the use of self-service solutions and interaction with organisations within the health and care sector by offering, among other things:

- a digital mailbox for receiving information from the health and care sector
- digital communication with organisations in the health and care sector
- the use of external tools as part of the follow-up of your health
- access to information that is registered about you in health registries
- a secure place to store your information.

## 3 Consent to use Helsenorge

### 3.1 Basis for processing

As regards your use of the services on Helsenorge, consent is the basis for the processing of personal data on the login pages. **Personal data** means information and assessments that can be linked to an individual. The data that is processed is specified in sections 3.2 and 3.3 below. **Processing** means any use of personal data, such as collection, recording, organisation, storage and disclosure, or a combination of such processing methods.

The services are covered by three levels of consent which are based on each other, so you can choose to give consent to one, several or all of the services.

The scope of the processing depends on the consent you give. You can decide for yourself how you wish to use Helsenorge and you can consent to the following selection of service categories: **Basic**, **Basic +** and **Full consent**.

You can withdraw your consent to use Helsenorge at any time. If you withdraw your consent to the processing of personal data when you use the services on Helsenorge, you will still have access to all content on Helsenorge which does not require login.

If you decide to withdraw your consent to use Helsenorge, your data will be deleted after 30 days. The services will immediately become unavailable to you. You can restore your access to the services at any time within the next 30 days by giving your consent again. If you do this, you will still have access to data that was stored before you withdrew your consent.

### 3.2 Processing of personal data when creating a profile

When you give your consent to use the services, a profile will be created for you.

The following data will be stored in your profile in connection with your use of the services:

- information on the consents you have given and other settings which govern the use of the services on Helsenorge (personal data settings)
- consent and opt-out status, where we manage these on behalf of other organisations. It is the organisation as controller that decides how long the data will be stored for
- the results of searches in health registries which could contain data about you will be displayed in a combined list which is stored on your profile
- data which you decide to register, such as the set-up of SMS notifications, opt-outs and powers of attorney (personal data settings)
- information about the time of login and the services you or other people on your behalf use, but no details about the actual use. This information will be available to you under "Usage log" (*Logg over bruk*). Corresponding data will be logged when a person with power of attorney uses the services on your behalf.

#### 3.2.1 Data about you that is retrieved from public registries and stored on your profile

- national ID number or D number
- name, gender, address and information

about custody of children are retrieved from the National Population Register

- your digital contact details (mobile phone number and/or email address) are retrieved from the Norwegian Digitalisation Agency's Contact and Opt-out Register (*Kontakt- og reservasjonsregisteret*) and used to send you notifications, reminders and information about the services. The register is a common solution which all public entities must use. You must therefore provide the Contact and Opt-out Register with accurate information and update your details in the event of any changes. This can be done via ID-porten here:

<https://brukerprofil.difi.no/minprofil>

- information on your general practitioner (GP) is retrieved from the GP register (*Fastlegeregisteret*) every time you log in and is not saved
- personal data from the National Population Register and the GP register can be used to pre-populate forms for organisations in the health and care sector.

#### 3.2.2 Use of national ID numbers

Your national ID number is required in order to identify you in connection with the use of the services. This applies for example to the use of video consultations, dialogue services and the mailbox function. Your national ID number will not be passed on, disclosed or used for any other purpose.

Organisations in the health and care sector may also obtain selected privacy settings which we store about you. This could for example concern information about representation (powers of attorney) and whether you have consented to or opted out of using certain services.

National ID numbers are stored in technical logs in order to facilitate troubleshooting and error correction in the services.

### 3.3 Processing of personal data by the services

#### 3.3.1 For Basic (Basis) services:

Many of the services on Helsenorge retrieve data from registries and health enterprises that you have been in contact with and display it to you when you are logged in. These services do not store any data. This applies to:

- information relating to prescriptions retrieved from the Prescription Intermediary (*Reseptformidleren*)

- information linked to vaccinations retrieved from the National Immunisation Registry
- information about test results from the MSIS registry
- information registered in your summary care record is retrieved from your summary care record.
- information from health registries which offer digital access via Helsenorge
- status of exemption cards and user fees which are registered under your name is retrieved from Helfo.

In order to provide you with a general overview of your contact with registries which offer digital dialogue, we store the following data:

- messages/forms which you send to registries
- received messages/forms which you receive from registries
- acknowledgement of a change of GP and other actions which you perform.

#### 3.3.2 For Basic + (Basis +):

In addition to the processing mentioned under basic services, the following processing will also be performed if you consent to Basic +:

- viewing of documents made available from your patient record which you open
- viewing of logs of the healthcare personnel who have accessed your medical records.

You can also initiate contact with the health enterprise concerned. Messages, documents

and forms which you send and receive will then be saved. You can also choose to save patient record documents in your document archive.

#### 3.3.3 Full consent (Fullt samtykke):

In addition to the processing mentioned under basic and basic + services, the following processing will be carried out if you give Full consent:

- display of information about and an overview of your contact persons in the health and care sector who offer digital dialogue. Some organisations store the information in your profile, while others only display the information while you are logged in
- presentation of test results from the health and care sector
- storage of:
  - o messages to and from individuals and organisations in the health and care sector
  - o documents and forms which you receive
  - o your own measurements, records and documents which you upload yourself. There are certain limitations on the type of data, formats and scope. Information on this will be provided when you attempt to save the data. You can delete content which you have uploaded to Helsenorge yourself
  - o administrative information relating to your health will be saved, e.g. appointments

### 3.4 Processing of personal data in connection with case processing

On Helsenorge, you will find various forms which you can fill in and send to us so that we can carry out actions on your behalf. NHN and Helfo case officers can only view and make changes to your profile settings and information on your behalf if you request the changes (e.g. if you want a power of attorney to be set up). The registration, storage and retention of forms is carried out in accordance with the record-keeping obligation pursuant to the Freedom of Information Act and is stored in a separate case processing and archive system.

## 4 Your use of the services

### 4.1 Requirements on the user

You must be at least 16 years of age in order to give your consent to use Helsenorge's login services. Some services may be available to children aged between 12 and 16 with the consent of the persons who have custody of the child. Children over the age of 13 can consent to information society services when they are made available on Helsenorge.

### 4.2 Settings

When you are logged in to Helsenorge, you can manage your use of the Services via various settings in your profile. You will be notified by SMS/e-mail of any new content which is received by Helsenorge. You are responsible for familiarising yourself with new content which you receive. You can: change some of the notification settings in your profile, but you cannot opt out of notifications concerning important information from organisations in the health and care sector. If you are registered with both your email address and mobile phone number in the Contact and Opt-out Register, you can choose the channel via which you would prefer to receive notifications using the settings in your profile on Helsenorge.

### 4.3 Statistics

To improve our services, we need to collect anonymised data about how Helsenorge is used. Find out more about how NHN uses web analysis tools and log data to compile statistics and analyses here:

<https://www.helsenorge.no/personvern-og-nettsikkerhet/personvern/>

### 4.4 Inactivity

If you have not updated your contact details in the Agency for Public Management and eGovernment's Contact and Opt-out Register during the last eighteen (18) months, you will be assigned the status "inactive" with regard to use of the services. Your treatment providers will no longer be able to

send you information via Helsenorge. This is to prevent health data from being sent to you via a digital channel that you do not use. The services will be reactivated if you log in to Helsenorge again.

### 4.5 Notifications and other enquiries

When you consent to the use of services on Helsenorge, you will be able to receive post and messages from organisations in the health and care sector to Helsenorge. If you have opted out in the Agency for Public Management and eGovernment's Contact and Opt-out Register, you will receive important information via your physical mailbox in addition to Helsenorge.

By agreeing to these conditions, you also allow organisations in the health and care sector that offer digital services to communicate electronically with you as described in these conditions. This also includes allowing them to contact you and send you letters, forms, requests for participation in health surveys, etc.

### 4.6 Use on behalf of children

You can use selected services on behalf of children you have custody of until the child reaches 16 years of age. The child must also be registered in the National Population Register under the same residential address as one of the parents. Following a professional assessment, healthcare professionals can decide that it would not be prudent to use digital channels in connection with the provision of healthcare and access to your child's medical records. The child's profile may then be rendered inaccessible on Helsenorge.

### 4.7 Power of attorney

You can grant other people power of attorney to use the services on your behalf. The attorney (the holder of the power of attorney) will then be able to use services on your behalf and access your health data. However, some services allow you to hide content from the attorney, such as documents in your document archive. Some services may be closed to use by the person who wishes to represent you if giving access

to them would be in breach of health or privacy laws. It is the health enterprise that provides the services which will assess whether the services should be made available to anyone other than the citizen themselves (i.e. you).

#### *4.8 Deletion*

You can delete information that you have uploaded or stored on Helsenorge yourself. You can also delete messages, forms and letters which you send and receive. We store backup copies of the information for up to six months. The backup copies will only be used to restore the service in the event of a technical problem.

Information that is subject to the record-keeping obligation will be registered with your treatment provider and can be found there, even if you delete your copy on Helsenorge.

NHN reserves the right to delete information that has been sent erroneously or in breach of law, regulation or a government decision, or which in NHN's opinion otherwise entails a threat to the services or constitutes misuse of the services. If an erroneously sent document has been opened, you and the sender will be notified of the deletion, provided that there are no technical or legal obstacles to such notification.

#### *4.9 Your transfer of information from the services*

You have the right to copy or transfer your health data, personal data and other information which you have stored, either to yourself or to others at any time. This applies within the framework of what is technically possible for the various formats in which the data is stored. You are responsible for the processing of copied and transferred information. This right also applies in the event of termination of the services; see section 8.2. It should be noted that you must initiate a transfer yourself before deleting information or withdrawing your consent, or if you have been

notified that NHN has decided to block your access to the services.

#### *4.10 Price of the services*

The services are free to use. Use of some services may trigger payments to healthcare professionals, such as payments to doctors for consultations which have taken place. The doctor will invoice the user fee and any fees in accordance with the applicable rates at all times.

#### *4.11 Termination in the event of the user's death*

When NHN is notified of the death of a user by the National Population Register, consent for the services will be considered to have been withdrawn, and stored information will be deleted after 30 days.

### *5 Access control and information security*

#### *5.1 Access to health data*

Only you can access the information that is stored on Helsenorge, subject to the exceptions that are described in this section.

You can grant access to other private individuals through power of attorney; see section 4.6. Healthcare professionals do not have general access to your information through Helsenorge, but some services enable you to opt to share information with selected healthcare professionals.

Authorised technical personnel performing normal administrative tasks on the technical solution will not be able to gain access to your personal data. In certain situations in connection with troubleshooting or operating problems, dedicated operating personnel may be able to gain access to your personal data. This access will only take place in accordance with very strict security procedures, and

the operating personnel will be required to keep a specific log of when and why such access took place.

### *5.2 Information security*

NHN is committed to safeguarding confidentiality, integrity and availability linked to the processing of your personal data.

Amongst other things, this means that:

- we encrypt communications to and from our services
- we restrict access to personal data for our employees and subcontractors who process this data on our behalf, and we control their processing of personal data in the computer systems
- we have established extensive physical, technical and administrative measures to safeguard the information in the best possible way
- when you log in, checks will be performed to ensure it is you that is logging in through the services offered by the Norwegian Digitalisation Agency's ID-porten
- URL, IP address and time will be logged in connection with all calls to Helsenorge
- all files that Helsenorge receives will automatically be scanned for viruses, and any information in which viruses are found may be deleted automatically.

You are obliged to use the services with due care and attention to ensure that information security is safeguarded and your or other people's information does not go astray.

### *5.3 Logs*

Log data is stored for a maximum of two years before it is deleted.

## *6 Your rights*

### *6.1 Access*

Everyone has the right to general information about NHN's processing of personal data.

You have the right to be told what information we process about you, and what information

has been processed about you in connection with your use of the services on Helsenorge. You can view this information for yourself by logging in to Helsenorge. You also have the right to receive information about where the personal data was obtained from, the purposes for which it is being used, and whether it has been disclosed to anyone else.

You also have the right to be told what security measures we have put in place in order to safeguard your information (see section 5.2), provided that access does not compromise the security of our solutions. See section 10 for contact details.

### *6.2 Correction*

Information that we process about you should be correct. If you find any errors, you must contact the company or registry that registered the information about you in order to have it corrected. If you are unsure, contact the Norwegian National Contact Point for Healthcare (Veiledning helsenorge.no) for assistance in finding out who you need to contact.

## *7 Changes*

### *7.1 Changes to the services*

From time to time, NHN makes minor changes to the services, such as functionality improvements, changes to the user interface, software and hardware upgrades, and minor changes to the level of service. Wherever possible, the implementation of such changes will be planned and announced on Helsenorge.

Any other changes that NHN makes to the services can be made with one month's notice. Changes which are considered to benefit you or which are only minor in nature may be implemented without notice. Information about planned changes and new/revised features will be updated on Helsenorge on an ongoing basis.



If the services are expanded to include new aims or otherwise altered significantly, you will be asked to give your consent again.

#### *7.2 Amendments to the conditions of use*

Amendments to the conditions of use which are of material importance for the processing of your personal data may be implemented with one (1) month's notice on Helsenorge. In the event of such changes, you will be asked to agree to the new conditions of use.

### 8 Delimitation of NHN's responsibilities

#### *8.1 No responsibility for content or*

#### *other circumstances relating to you as a user*

In addition to established security procedures, the security of the services is based on you ensuring that you protect your own data from access by unauthorised persons. NHN is not responsible for any information that you send or receive when using the services.

NHN is not responsible for the content of the information or the content of any links. NHN is not responsible for any errors, omissions and/or undesirable characteristics of information, data, file attachments, links, etc. over and above the fact that information that is received by Helsenorge is automatically scanned for viruses.

NHN is not responsible for any errors that you make personally, e.g. deleting or sending information to the wrong recipient.

NHN is also not responsible for any errors or omissions in information from healthcare professionals or in procedures and processes in health organisations, e.g. how healthcare personnel follow up reports. This is a matter between you and the healthcare professional you are communicating with.

#### *8.2 Withdrawal of the services*

If NHN discontinues one or more of the services, information on this will be provided with at least six (6) months' notice on Helsenorge. The website will provide information on the withdrawal of the service and how this will affect you and your health and

personal data in the services.

### 9 Notification of NHN of errors and omissions

Any errors or omissions must be notified to the following point of contact so that they can be corrected

soon as possible: Norwegian National Contact Point for Healthcare (*Veiledning helsenorge.no*) on 23 32 70 00

### 10 Contact details for exercising your rights

Below, you will find contact details for the controller regarding information that has been

registered about you. To exercise your rights, you must contact the controller for the Information directly. Never send health or other sensitive personal data by e-mail.

- Key information about you from the National Population Register (*Folkeregisteret*) (e.g. name, address, custody of children):  
Norwegian Tax Administration (*Skatteetaten*)  
Telephone number: 800 80 000  
Organisation number: 974761076

- Contact and Opt-out Register (*Kontakt- og reservasjonsregisteret*):  
Norwegian Digitalisation Agency (*Digdir*)  
Telephone number: 22 45 10 00  
E-mail: [postmottak@digdir.no](mailto:postmottak@digdir.no)  
Organisation number: 991825827

- Information about your GP from the GP Register (*Fastlegeregisteret*):  
Norwegian Directorate of Health  
Telephone number: 810 20 050  
E-mail: [postmottak@helsedir.no](mailto:postmottak@helsedir.no)  
Organisation number: 983 544 622

- The Norwegian Data Protection Authority (*Datatilsynet*) is the supervisory authority and is responsible for ensuring that laws and regulations that apply to the processing of personal data are followed and that any errors or omissions are corrected:  
Telephone number: 22 39 69 00  
E-mail: [postkasse@datatilsynet.no](mailto:postkasse@datatilsynet.no)  
Organisation number: 974761467

- Norsk Helsenett's Data Protection Officer  
Email: [personvernombud@nhn.no](mailto:personvernombud@nhn.no)  
Organisation number: 994 598 759