

The Health and Medical Care Board, Stockholm Region

via e-mail

Record number:

DI-2019-7321

Your record number:

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Date:

2021-06-07

Decision after supervision according to

the Data Protection Ordinance against the Health and Medical Care Region

Stockholm

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The decision of the Integrity Protection Authority

The Integrity Protection Authority (IMY) states that the Health and Medical Care Board

Stockholm Region (Health and Medical Care Board) for an unknown period before and during

the audit has processed personal data in violation of Articles 5 (1) (a) and 13 and

14 of the Data Protection Ordinance¹ by not informing healthcare seekers who call 11772

on the collection of telephone numbers and municipal ID for the purpose of ensuring that calls to

1177 is taken care of by the care provider MedHelp AB and the collection of

call information from MedHelp AB for follow-up and quality purposes.

IMY decides on the basis of ch. Section 2 of the Data Protection Act³ and Article 58 (2) and 83

the Data Protection Ordinance that the Health and Medical Care Board must pay an administrative fee

penalty for infringements of Articles 5 (1) (a) and 13 and 14 (i)

the Data Protection Ordinance of SEK 500,000 (five hundred thousand).

In accordance with Article 58 (2) (d) of the Data Protection Regulation, the IMY provides

the health care board that, as soon as possible and no later than two months after the decision has been won

legal force, in accordance with Articles 13 and 14 of the Data Protection Regulation

care seekers who call 1177 for collection of telephone numbers and municipality ID for

the purpose of ensuring that calls to 1177 are taken care of by the care provider MedHelp AB and

on the collection of call information from MedHelp AB for follow-up and

quality purposes.

Background

On February 18, 2019, Computer Sweden published an article entitled "2.7

million recorded calls to 1177 Vårdguiden completely unprotected on the internet ". In the article

states, among other things, that "On an open web server, completely without password protection or

other security, we have found 2.7 million recorded calls to the advisory number 1177. "

IMY initially initiated supervision of Voice Integrate Nordic AB, Inera AB and MedHelp

AB.

It emerged that three regions hired MedHelp AB as care providers on 1177 and Inera

AB to connect the calls to MedHelp AB. The IMY therefore initiated written supervision on

June 27, 2019 against the Health and Medical Care Board to control the treatment of

personal data due to care seekers calling 1177. Supervision was initiated

at the same time against the Regional Board Region Sörmland and the Regional Board Region

Värmland.

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the natural persons with regard to the processing of personal data and on the free movement of such data and on repeal of Directive 95/46 / EC (General Data Protection Regulation).

2 On the website 1177.se it is stated "Call telephone number 1177 for medical advice around the clock."

3 Act (2018: 218) with supplementary provisions to the EU Data Protection Regulation.

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Justification of the decision

Legal background

National rules on health care

The tasks of the health care system are regulated in, among other things, the Health Care Act (2017: 30), HSL.

Measures to medically prevent, investigate and treat diseases and injuries

defined as health and medical care, ch. 1 § HSL. By principal is meant that region

or the municipality which according to the law is responsible for offering health and medical care to

the population of the region or municipality. Within a principal's geographical area can

one or more care providers conduct business, ch. 2 § HSL. By caregiver is meant

government agency, region, municipality, other legal entity or sole trader

which conducts health and medical care activities, ch. 2 § 3 HSL. Regions and

municipalities may, while retaining leadership, conclude an agreement with someone else to

perform the tasks for which the county council or municipality is responsible, ch. 15 1 § HSL.

Anyone who has a constitutionally regulated responsibility for the provision of care is referred to as the principal.

The responsibility does not imply an obligation to run the business yourself, but the operation can

lie on someone else who is then referred to as a care provider (Bill 1981/82: 97 p. 33 f.). The public responsibility as a principal does not imply a decision-making right over the care provider's daily activities and it does not deprive the caregiver of the responsibility that comes with it the role of caregiver (Bill 2016/17: 43 p. 86).

Personal data responsibility

Pursuant to Article 4 (7) of the Data Protection Regulation, a data controller means a natural or legal person, public authority, institution or other body such as alone or together with others determines the purposes and means of the processing of personal data. About the purposes and means of treatment determined by Union or national law of the Member States, it may personal data controller or the specific criteria for how he or she is to be appointed provided for in Union law or in the national law of the Member States.

Pursuant to Article 5 (2), data controllers shall be responsible for and be able to demonstrate that: the principles of Article 5 (1) are complied with (the principle of liability).

Basic principles and legal basis

Pursuant to Article 5 (1) (a) of the Data Protection Regulation, personal data shall be processed in one legal, correct and transparent in relation to the data subject (principle of legality, accuracy and transparency). The principle of data minimization in Article 5 (1) (c) means that: personal data must be adequate, relevant and not too extensive in relation to the purposes for which they are treated.

In order for a processing of personal data to be legal, it is required that it has the support of someone of the legal bases set out in Article 6 (1) of the Data Protection Regulation. At treatment for health care purposes, it is mainly Article 6 (1) (c) (legal obligation) or 6.1.e (public interest or exercise of authority) which may be applicable. According to Article 6 (3), the basis for the treatment referred to in Article 6 (1) (c) and (e) is determined in accordance with Union law or the national law of a Member State which:

the person responsible for personal data is covered by. This means that if a caregiver processing of personal data is necessary in order to fulfill a legal obligation or perform a task of general interest so required for the processing to be legal that

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the legal obligation or task of general interest is governed by national law (or in Union law).

Health information constitutes so-called sensitive personal data. It is forbidden to process such personal data in accordance with Article 9 (1) of the Data Protection Regulation, if not the treatment is covered by one of the exceptions in Article 9 (2).

Registered right to information

Obligation of personal data controllers to voluntarily provide data subjects information on the processing of personal data is provided in Articles 13 and 14 i the Data Protection Regulation. It is relatively comprehensive information that should be provided to the data subjects.

Calls to 1177

The Health and Medical Care Board Region Stockholm states, among other things, the following.

The region is the principal according to ch. 2 § HSL. According to the regulations of the regional council the board shall exercise management over the health and medical care in the region and be responsible for all health care provided or financed by the region. The task of conducting health care has been handed over to the care provider MedHelp AB with the support of 15 Cape. § 1 of the same law. The region processes personal data about municipality ID and telephone number for the purpose of ensuring that calls to 1177 are handled by the court healthcare providers. The information is collected from the calling person's telecom operator.

The treatment is necessary to fulfill a task of general interest. Health and the health care board is responsible for personal data. The treatment is performed by Inera AB in as a personal data assistant.

IMY's assessment

The Health and Medical Care Board may, while retaining principalship in accordance with ch. § 1 HSL concludes an agreement with MedHelp to perform the tasks for which the region is responsible according to HSL. IMY notes that no circumstance has emerged as contradicts the Health and Medical Care Board's task that the board is data controller in accordance with Article 4 (7) of the Data Protection Regulation.

IMY assesses that the Health and Medical Care Board's processing of personal data about municipality ID and telephone number are adequate, relevant and not too extensive in in relation to the purpose of ensuring that calls to 1177 are handled by MedHelp AB.

The processing is therefore judged to be compatible with the principle of data minimization in Article 5 (1) (c) of the Data Protection Regulation.

The Health and Medical Care Board has a task that is established in national law by HSL. The basis for the treatment is determined in accordance with Article 6 (3) (i) the Data Protection Regulation. IMY assesses that the Health and Medical Care Board's treatment of municipality ID and telephone number is a necessary processing of personal data for that the board must fulfill a task of general interest and that there is legal support for the treatment referred to in Article 6 (1) (e).

Collection of call information from MedHelp AB for follow-up and quality purposes

The Health and Medical Care Board states, among other things, the following.

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The Health and Medical Care Board collects for follow-up and quality purposes

personal information from MedHelp AB about people who have called 1177 from Stockholm

county. The information includes social security number, contact reason (structured codes

for example for fever, cough, etc.), referral (self-care, emergency room, health center, etc.),

activity ID for the care unit where the patient may have received a booked time, serial number

on journal entry if journal has been drawn up and time for interview. The information

referred to below as the call information. The treatment is done to develop

the function of health care counseling in the health care system. Health and

The health care board follows contact reasons, where the patient has been referred and compliance

to the councils. The treatment is necessary to fulfill a task of general interest.

The legal basis is established in national law by HSL and the information provided by

The health and medical care committee is responsible for this by decision of the regional council.

The processing of personal data is also supported by the Patient Data Act (2008: 355), PDL.

The region is responsible for the quality of the business even if the execution by agreement has

handed over to a private contractor in accordance with ch. 1 § HSL. According to ch. § 8

The Local Government Act (2017: 725) is the responsibility of the region to control and follow up

activities handed over to private contractors. The Health and Medical Care Board

encrypts the social security number or backup number, to a pseudonym / "ID number" with

one-way encryption with the board's IT operations provider. The committee's staff has not

position with or access to social security number or other directly identifying

personal information from MedHelp AB. Article 9 (2) (h) of the Data Protection Regulation provides a

legal support for the processing of sensitive personal data.

With regard to the requirement of professional secrecy in Article 9 (3), the personal data of:

the region according to the board of strong secrecy according to ch. 25 § 1 OSL when staff within

the framework for the board's management and control function and its customer activities

who holds a position with patient data from the health service. The technical staff of the supplier does not have any position with the personal data in readable form, except in very rare exceptional cases where it is deemed indispensable necessary in connection with, for example, error correction. As of January 1, 2021 the IT operations provider's personnel are subject to a statutory duty of confidentiality in accordance with the Act on duty of confidentiality when outsourcing technical processing or storage of data (2020: 914).

IMY's assessment

IMY initially states that the Health and Medical Care Board has submitted the task of conducting health and medical care regarding health care counseling via the telephone number 1177 to the care provider MedHelp AB and that the board therefore does not conduct individualized care that entails the processing of personal data for the purposes specified in 2 kap. § 4 PDL in activities with the board. The Health and Medical Care Board constitutes thus in the present review not a personal data responsible caregiver according to it the national specification in ch. § 6 PDL of personal data responsibility. It has not either emerged that the Health and Medical Care Board is responsible for personal data for central processing of personal data in a national or regional quality register according to 7 kap. § 7 PDL.

With regard to personal data liability, IMY has found above that Health and the health care board is responsible for personal data in accordance with Article 4 (7) of the Data Protection Regulation and there is no reason to make a different assessment here.

The Health Care Board collects and pseudonymizes the conversation information from MedHelp AB about people who called 1177 for healthcare advice. The committee

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states that the staff at the board does not have a position with or access to personal identity number or other directly identifying personal information from MedHelp AB. IMY considers that the processing of personal data is adequate, relevant and not for extensive in relation to the follow-up and quality purpose. The treatment is therefore considered to be compatible with the principle of data minimization in Article 5 (1) (c) (i) the Data Protection Regulation.

Of ch. 10 Section 8 of the Local Government Act states that when the care of a municipal matter by agreement has been handed over to a private contractor, the municipality or the region control and follow up the activities. The task of Health and

The health care board has to control and follow up the activities that MedHelp AB performs is, according to IMY's assessment, a task of general interest according to art. 6.1 e i the Data Protection Regulation. The information is established in Chapter 10. Section 8 of the Local Government Act on it manner required by Art. 6.3 of the Data Protection Regulation. IMY assesses that Health and the health care board's processing of the interview information through collection from MedHelp AB and pseudonymisation are necessary for the board to be able to fulfill the said task. The treatment may therefore be carried out on the basis of Article 6 (1) (e) (i) the Data Protection Regulation.

The personal data that the Health and Medical Care Board collects from MedHelp and pseudonymizes constitute personal health data within the meaning of Article 4 (15) (i) the Data Protection Regulation. Health information constitutes sensitive personal data. There is as a general rule, a ban on the processing of sensitive personal data in accordance with Article 9 (1) (i) the Data Protection Regulation. According to Article 9 (2) (h) of the Data Protection Regulation may be sensitive personal data are processed despite the prohibition in Article 9 (1) if the processing is necessary for reasons related to, for example, preventive health care, provision of health care, management of health care services,

on the basis of Union law or the national law of the Member States. HSL and

The Local Government Act is an example of national law referred to in Article 9 (2) (h).

The Health and Medical Care Board is responsible according to ch. Section 8 of the Local Government Act for quality in the business even if the performance of the care has been handed over to by agreement

MedHelp AB in accordance with ch. 1 § HSL. IMY assesses that Health and

the health care board's processing of sensitive personal data through the collection of

call information from MedHelp and pseudonymization are necessary in the way that

referred to in Article 9 (2) (h) of the Data Protection Regulation. The provision in ch. 25 1 § OSL om

The duty of confidentiality for persons active in health care constitutes a statutory regulation

duty of confidentiality which satisfies the requirement in Article 9 (3) that personal data be processed by or

under the responsibility of a professional or other person subject to professional secrecy,

which is a prerequisite for the processing of sensitive personal data on health and

the field of healthcare shall be permitted under Article 9 (2) (h) of the Data Protection Regulation.

HSL's and the Local Government Act's provisions on care providers as well as control and

follow-up of private contractors does not include the IT operations provider. IMY's supervision has not

covered the relationship with the IT operations provider and IMY therefore does not take in this case

any further investigative measures regarding calls to 1177 and with what support in

national law in which the IT service provider processes personal data. IMY can though

note that since 1 January 2021, the IT operations provider's personnel have been subject to

a statutory duty of confidentiality in accordance with section 4 of the Act on professional secrecy at

outsourcing of technical processing or storage of data, which according to § 1

applied when an authority entrusts to a company or another individual

(service provider) to only technically process or technically store data. Actions

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taken by a service provider under the said Act may be security enhancing measures such as pseudonymisation (Bill 2019/20: 201 p. 22).

The region's information for healthcare seekers

The Data Protection Regulation contains far-reaching obligations to provide information to registered. The person responsible for personal data is responsible for the information provided.

The Health and Medical Care Board states, among other things, the following.

No specific information is provided to individuals who call 1177 about which personal data processing performed in connection with connection of the call to the care provider MedHelp AB. Nor is it specifically stated that a certain part of the treatment is performed of the region in its capacity as healthcare principal. This can be seen as a shortcoming in transparency in relation to data subjects.

IMY's assessment

On 25 June 2019, IMY received a printout from www.1177.se about 1177 medical advice on the phone. The website states that behind 1177 Vårdguiden Swedish healthcare through all regions is in collaboration. 1177 is a national telephone number for medical advice that you can call around the clock. Each region runs its own business for health counseling either under its own auspices or through procured subcontractor. The calls that are counseling calls are recorded. The question "Who is responsible for the personal data being handled correctly?" answered as follows. "It is your healthcare provider who is responsible for ensuring that the personal data is handled correctly and legally. When care is provided by a region, there are one or more boards in the region who are ultimately responsible. In private care, it is the company or it activities that carry out the care that is responsible. "

The obligation to provide information is extensive and a basic precondition for

individuals should be able to have knowledge of and control over how their personal data treated. Requirement of transparency is a fundamental principle under Article 5 (1) (a) (i) the Data Protection Regulation. Recital 60 of the Data Protection Regulation states that the principles if fair and transparent treatment requires the data subject to be informed that treatment takes place and the purpose of it. The person responsible for personal data should go to it registrants provide all additional information required to ensure a fair and open processing, taking into account the specifics of personal data processing circumstances and context.

Pursuant to Article 12 (1) of the Data Protection Regulation, the data controller shall take appropriate measures to provide the data subject with all information under Articles 13 and 14 in a concise, clear, comprehensible and easily accessible form, with use of clear and unambiguous language, in particular for information that is specifically targeted to children. Article 13 sets out the information to be provided by the controller provide if the personal data is collected from the data subject. Article 14 states the information that the personal data controller must provide the personal data has been collected from another source than the registered one.

Information must be provided about, among other things, the identity of the person responsible for personal data and contact details, the purposes of the processing for which the personal data is intended, the legal basis for the treatment and that there is a right to

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the personal data controller requests access to personal data. If appropriate information shall be provided on contact details for the data protection officer.

The Health and Medical Care Board collects the care applicants' telephone numbers and

municipal ID for the purpose of ensuring that calls to 1177 are taken care of by the care provider

MedHelp AB. From MedHelp AB, the board collects conversation information such as

pseudonymized for follow-up and quality purposes. Health and

the health care board admits a lack of transparency in relation to data subjects.

The IMY notes that in accordance with Articles 13 and 14 of the Data Protection Regulation,

extensive requirements for information to data subjects that the Health and Medical Care Board does not

leaves. It is not sufficient that the board on the website 1177.se informs that

"It is your healthcare provider who is responsible for ensuring that the personal data is handled correctly and legally. "

For example, there is no information that the Health and Medical Care Board is

personal data controller, about the board's contact information, about the purpose of

the treatment, the legal basis for the treatment and the existence of a

the right to request access to personal data from the person responsible for personal data. It's missing

also contact information for the data protection officer.

Because the Health and Medical Care Board does not inform care seekers in connection with

the collection of telephone numbers and municipal IDs for care applicants' telephone calls to

1177 or the subsequent collection of call information from MedHelp AB,

IMY states that the Health and Medical Care Board has processed personal data in

in violation of Articles 13 and 14 of the Data Protection Regulation on the information to be provided

provided voluntarily to data subjects. The population in Stockholm County was 2,391,990 in the quarter

4 2020.⁴ The lack of information can thus affect a very large number

care seekers.

Article 5 (1) (a) of the Data Protection Regulation states that personal data must be processed

in a legal, correct and transparent manner in relation to the data subject. Absence of

information under Articles 13 and 14 is deemed to be so extensive and serious that it

significantly limits the conditions for care seekers to exercise their rights. IMY do

therefore the assessment that there is also a breach of the principle of transparency in

Article 5.1 a.

Choice of intervention

Possible intervention measures regarding information to care seekers

The IMY has a number of remedial powers available under Article 58 (2) (i)

the Data Protection Regulation, among other things, the IMY may impose on the data controller

to ensure that the processing takes place in accordance with the Regulation and, if necessary, on one specifically and within a specific period.

Pursuant to Articles 58 (2) and 83 (2) of the Data Protection Regulation, the IMY has the power to impose

administrative penalty fees in accordance with Article 83. Subject to

the circumstances of the individual case, administrative penalty fees shall be imposed

in addition to or in place of the other measures referred to in Article 58 (2).

Population in the country, counties and municipalities 31 December 2020 and population changes 1 October – 31 December 2020.

Total (scb.se)

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Furthermore, Article 83 (2) of the Data Protection Regulation sets out the factors to be taken into account

in the decision to impose administrative penalty fees and in the determination of

the size of the fee. In the case of a minor infringement, the IMY receives according to what

stated in recital 148 of the Data Protection Regulation instead of imposing a penalty fee

issue a reprimand in accordance with Article 58 (2) (b). Account shall be taken of aggravating and

mitigating circumstances in the case, such as the nature of the infringement, the degree of difficulty

and duration as well as previous violations of relevance.

Article 83 (7) allows Member States to lay down rules on whether and to what extent public authorities and bodies must be able to impose administrative penalty fees.

Of ch. 6 Section 2 of the Data Protection Act states that the supervisory authority may charge one penalty payment by an authority for infringements referred to in Article 83 (4), 83 (5) and 83.6 Data Protection Regulation. In that case, Article 83 (1), (2) and (3) shall apply.

A penalty fee must be imposed

IMY has above assessed that the Health and Medical Care Board has violated Articles 5 (1) (a) and 13 and 14 of the Data Protection Regulation. These Articles are covered by Article 83 (5) and in the event of a breach of these, the supervisory authority shall consider imposing administrative penalty fee in addition to, or instead of, other corrective measures.

In view of the fact that the infringements found concerning shortcomings in information to care seekers have touched a large number of registered, which has limited care seekers opportunities to exercise their rights, it is not a matter of a minor infringement.

There is thus no reason to replace the sanction fee with a reprimand. Health and the health care board must thus be subject to administrative sanction fees.

Determining the size of the penalty fee

General provisions

According to Article 83 (1) of the Data Protection Regulation, each supervisory authority shall ensure that: the imposition of administrative penalty charges in each individual case is effective; proportionate and dissuasive. Article 83 (2) sets out the factors to be taken into account in determining the amount of the penalty fee applicable to the infringement. In the assessment of the size of the penalty fee, account shall be taken of, among other things, the infringement character, degree of difficulty and duration, whether it was a matter of intent or negligence, what measures have been taken to alleviate the damage they registered has suffered, the degree of responsibility taking into account the technical and organizational measures

carried out in accordance with Articles 25 and 32, the nature of the supervised entity
cooperated with the supervisory authority, the categories of personal data concerned;
how the infringement came to the IMY's knowledge and whether there are other aggravators or
mitigating factor such as direct or indirect financial gain from the proceeding.

For authorities, according to ch. 6 § 2 second paragraph of the Data Protection Act that

The penalty fees shall be set at a maximum of SEK 5,000,000 for violations such as
referred to in Article 83 (4) of the Data Protection Regulation and up to a maximum of SEK 10,000,000 for
infringements referred to in Article 83 (5) and (6). Infringements of Articles 5, 13 and
14 are covered by the higher penalty fee under Article 83 (5).

Assessment of mitigating and aggravating circumstances

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Everyone who is ill has the right to care around the clock. Care seekers are referred in large
extent to call 1177 as a contact route to receive care, without others
contact routes are emphasized. Care seekers' contacts with 1177 give rise to an extensive
processing of sensitive and privacy-sensitive personal data, such as the care seeker
who calls 1177 can not resist. However, there is a right to access
the personal data afterwards.

As has been established, there are approximately 2.4 million inhabitants in Stockholm County. The lack of
information can thus affect a very large number of care seekers who call 1177
and whose sensitive personal data is collected by the Health and Medical Care Board from
MedHelp AB. The provisions on information mean that Health and
the health care board must make people seeking care aware of
the processing of personal data and the rights of care applicants in connection with

the board's processing of personal data.

It is aggravating that the lack of information is very extensive, lasting and concerning one large number of care seekers who can contact 1177 without them receiving information about including the Health and Medical Care Board and the Data Protection Officer contact information. The lack of such contact information limits the care applicant's opportunities to exercise their rights, such as requesting access to personal data in gradually. It is also aggravating that information is not provided about the collection of information is provided for the purpose of ensuring that calls to 1177 are taken care of by the care provider MedHelp AB and on the collection of call information from MedHelp AB for follow-up and quality purposes.

In order for penalty fees to be effective, dissuasive and proportionate, a weighted assessment is made in each individual case. As for the penalty fee size, IMY finds based on an overall assessment, that the Health and Medical Care Board should pay an administrative penalty fee of 500,000 (five hundred thousand) kronor for those noted the shortcomings in information to care seekers.

Order

The Health and Medical Care Board has not informed care seekers in accordance with the requirements in the Data Protection Regulation. There is a large number of residents who can contact 1177 and who may suffer from a lack of information about, among other things, who they are personal data controller and his contact information. The lack of such contact information limits the care applicant's opportunities to exercise the right, for example to request access to personal data.

The Health Care Board shall therefore be ordered in accordance with Article 58 (2) (d) i the Data Protection Regulation as soon as possible and no later than two months after the decision gained legal force ensure that the processing in this respect takes place in accordance with the Data Protection Regulation in the manner set out in the Decision.

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This decision was made by the Director General Lena Lindgren Schelin after the presentation by department director Suzanne Isberg. In the proceedings, the lawyer Mattias has

Sandström and unit manager Katarina Tullstedt participated. At the final

The case is also handled by the IT security specialist Magnus Bergström, the Chief Justice

David Törngren and unit manager Malin Blixt participated.

Lena Lindgren Schelin, 2021-06-07 (This is an electronic signature)

How to appeal

If you want to appeal the decision, you must write to the Privacy Protection Authority. Enter i

the letter which decision you are appealing and the change you are requesting. The appeal shall

have been received by the Privacy Protection Authority no later than three weeks from the date of the decision

was announced. If the appeal has been received in time, send

The Integrity Protection Authority forwards it to the Administrative Court in Stockholm

examination.

You can e-mail the appeal to the Privacy Protection Authority if it does not contain

any privacy-sensitive personal data or data that may be covered by

secrecy. The authority's contact information can be found on the first page of the decision.

Copy to

The Data Protection Officer.

Appendix

Appendix - Information on payment of penalty fee.