

1(11)

The Swedish Health and Medical Board Region Stockholm

via e-mail

Diary number:

DI-2019-7321

Your diary number:

HSN 2019-1498

Date:

2021-06-07

Decision after supervision according to

the data protection regulation against the Health and Medical Board Region

Stockholm

Content

The Privacy Protection Authority's decision.....	2
Justification of the decision.....	3
Legal background.....	3
National regulations on health and medical care.....	3
Personal data responsibility.....	3
Basic principles and legal basis.....	3
Registered right to information.....	4
Call to 1177.....	4
IMY's assessment.....	4
The collection of call information from MedHelp AB for follow-up and quality purposes.....	4
IMY's assessment.....	5
The region's information for care seekers.....	7

IMY's assessment..... 7

Choice of intervention..... 8

Possible intervention measures regarding information for care seekers..... 8

Penalty fee to be imposed..... 9

Determining the amount of the penalty fee..... 9

Mailing address:

Box 8114

104 20 Stockholm

Website:

[www.imy.se](http://www.imy.se)

E-mail:

[imy@imy.se](mailto:imy@imy.se)

Phone:

08-657 61 00

Order..... 10

How to appeal..... 11

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

2(11)

The Privacy Protection Authority's decision

The Swedish Privacy Agency (IMY) notes that the Health and Medical Board

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

the review has processed personal data in violation of articles 5.1 a and 13 and

14 of the data protection regulation<sup>1</sup> by not informing care seekers who call 11772

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

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

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

IMY decides with the support of ch. 6. Section 2 of the Data Protection Act<sup>3</sup> and Article 58.2 and 83

the data protection regulation that the Health and Medical Services Board must pay an administrative

penalty fee for the violations of articles 5.1 a and 13 and 14 i

data protection regulation of 500,000 (five hundred thousand) kroner.

IMY orders according to Article 58.2 d of the data protection regulation Health and

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 inform

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

the purpose of ensuring that calls to 1177 are taken care of by the healthcare provider MedHelp AB as well as

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 with the title "2.7

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

is stated, 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 advice 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 at 1177 and Inera

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

27 June 2019 against the Health and Medical Board to check the treatment of

personal data due to care seekers calling 1177. Inspection started

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

Varmland.

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 flow 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 healthcare advice around the clock.".

3 Act (2018:218) with supplementary provisions to the EU's data protection regulation.

1

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

3(11)

Justification of the decision

Legal background

National regulations on health care

The tasks of the health and medical services are regulated in, among other things, the Health and Medical Services Act (2017:30), HSL.

Measures to medically prevent, investigate and treat diseases and injuries

is defined as health care, ch. 2 § 1 HSL. Principal refers to that region

or the municipality which, according to the law, is responsible for offering healthcare to

the population of the region or municipality. Within a principal's geographic area may

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

government authority, region, municipality, other legal person or individual trader

who conduct health and medical care activities, ch. 2 § 3 HSL. Regions and

municipalities may, while maintaining ownership, enter into an agreement with someone else to

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

The person who has a constitutionally regulated responsibility for providing care is referred to as the principal.

The responsibility does not mean an obligation to run the business yourself, but the operation can lie on someone else who is then referred to as a caregiver (prop. 1981/82:97 p. 33 f.). The public responsibility as principal does not imply control over the care provider day-to-day activities and that does not relieve the caregiver of the responsibility that comes with it either the role of caregiver (prop. 2016/17:43 p. 86).

#### Personal data responsibility

According to Article 4.7 of the data protection regulation, the person in charge of personal data means a natural or legal person, public authority, institution or other body which alone or together with others determines the ends and the means for the processing of personal data. About the purposes and means of the processing determined by Union law or the national law of the Member States, it can be the personal data controller or the special criteria for how he is to be appointed provided for in Union law or in the national law of the Member States.

According to Article 5.2, personal data controllers must be responsible for and be able to demonstrate that the principles of Article 5.1 are complied with (principle of responsibility).

#### Basic principles and legal basis

According to Article 5.1 a of the data protection regulation, personal data must be processed in one legal, correct and transparent manner in relation to the data subject (principle of legality, correctness 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 processed.

In order for the processing of personal data to be legal, it must be supported by someone of the legal grounds specified in Article 6.1 of the Data Protection Regulation. At treatment for health care purposes, it is primarily 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 processing stated in Article 6.1 c

and is determined in accordance with Union law or the national law of a Member State which the personal data controller is covered by. This means that if a caregiver's processing of personal data is necessary to fulfill a legal obligation or perform a task of public interest as required for the processing to be legal that

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

4(11)

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

Information about health 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 processing is covered by one of the exceptions in Article 9.2.

Registered right to information

Obligation of personal data controller to independently provide registered information on the processing of personal data can be found in articles 13 and 14 of the data protection regulation. Relatively comprehensive information is required provided to the registered.

Call to 1177

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

The region is the principal according to ch. 2. § 2 HSL. According to the regional council's regulations the committee shall exercise leadership over health care in the region and be responsible for all healthcare provided or financed by the region. The task to conduct 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 right

healthcare providers. The data is collected from the caller's operator.

The processing is necessary to fulfill a task of public interest. Health and the health care board is responsible for personal data. The treatment is carried out by Inera AB i property of personal data assistant.

IMY's assessment

The Health and Medical Services Board retains its principalship in accordance with ch. 15. § 1 HSL conclude an agreement with MedHelp to perform the tasks for which the region is responsible according to HSL. IMY states that no circumstance has emerged which contradicts the Health and Medical Services Board's statement that the board is personal data controller according to Article 4.7 of the data protection regulation.

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

The processing is therefore deemed to be compatible with the principle of data minimization i article 5.1 c of the data protection regulation.

The Health and Medical Services Board has a task that is established in national law by HRT. The basis for the processing is determined in accordance with Article 6.3 i data protection regulation. IMY assesses that the Health and Medical Services 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 public interest and that there is legal support for the processing according to Article 6.1 e.

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

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

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

5(11)

The Swedish Health and Medical Services Board collects for follow-up and quality purposes personal data from MedHelp AB about people who have called 1177 from Stockholms county. The data is, among other things, social security number, contact reason (structured codes for example for fever, cough, etc.), referral (self-care, close-up, health center, etc.), business ID for the care unit where the patient may have had a booked appointment, sequence number on journal entry if journal was drawn up and time of call. The data referred to below as the call information. The treatment takes place to develop the function of healthcare counseling in the healthcare system. Health and the medical board monitors contact reasons, where the patient has been referred and compliance to the council. The processing is necessary to fulfill a task of public interest.

The legal basis is established in national law through HSL and the data which the health and medical care board is responsible for 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 operations, even if the performance through an agreement has handed over to a private contractor in accordance with ch. 15 § 1 HSL. According to ch. 10 Section 8

The Municipal Act (2017:725) makes the region responsible for checking and following up operations handed over to private contractors. The Health and Medical Services Board encrypts the social security number or reserve number, to a pseudonym/"ID number" with one-way encryption with the board's IT operations supplier. The board's staff has not position with or access to social security numbers or other direct identifiers personal data from MedHelp AB. Article 9.2 h of the data protection regulation provides one legal support for processing sensitive personal data.

With regard to the requirement of confidentiality in Article 9.3, the personal data of the region according to the committee of strong secrecy according to ch. 25 § 1 OSL when personnel within



the framework for the committee's management and control function and its client activities who is responsible for patient data from the healthcare system. The technical the personnel of the supplier have no position with the personal data in readable form form, except in very rare exceptional cases when it is deemed unavoidable necessary in connection with, for example, error correction. As of January 1, 2021 is the IT operation supplier's staff subject to a statutory duty of confidentiality according to the Act on confidentiality when outsourcing technical processing or data storage (2020:914).

#### IMY's assessment

IMY notes initially that the Health and Medical Board has handed over the task of conducting health care regarding health care advice via telephone number 1177 to the healthcare provider MedHelp AB and that the board therefore does not conduct individual-oriented care that involves the processing of personal data for purposes specified in ch. 2 Section 4 PDL in operations at the committee. The Health and Medical Services Board consists of thus in the present review not a care provider responsible for personal data according to it the national specification in ch. 2 § 6 PDL of the responsibility for personal data. Neither has it has emerged that the Health and Medical Services Board is responsible for personal data for central processing of personal data in a national or regional quality register according to 7 Cape. § 7 PDL.

With regard to personal data responsibility, IMY has found above that Health and the health care board is responsible for personal data according to article 4.7 i data protection regulation and there is no reason to make a different assessment here.

The Swedish Health and Medical Board collects and pseudonymises the call information from MedHelp AB about people who called 1177 for healthcare advice. The committee

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

6(11)

states that the staff at the board has no position with or access to social security number or other directly identifying personal data from MedHelp AB. IMY assesses 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 deemed to be compatible with the principle of data minimization in Article 5.1 c i data protection regulation.

Of 10 ch. Section 8 of the Municipal Act states that when the management of a municipal matter by agreement has been handed over to a private executor, the municipality or the region control and follow up the operations. The task as Health and the medical board has to control and follow up the activities of MedHelp AB carries out is, according to IMY's assessment, a task of public interest according to art. 6.1 e i data protection regulation. The task is established in ch. 10. Section 8 of the Municipal Act on that manner required by art. 6.3 of the data protection regulation. IMY assesses that Health and the health care board's processing of the call information through collection from MedHelp AB and pseudonymisation is necessary for the committee to be able to fulfill its obligations the said task. The processing may therefore be carried out with the support of Article 6.1 e i data protection regulation.

The personal data that the Health and Medical Board collects from MedHelp and pseudonymizers constitute personal health data according to Article 4.15 i data protection regulation. Information about health constitutes sensitive personal data. There is as a general rule, a prohibition against processing sensitive personal data according to Article 9.1 i data protection regulation. According to Article 9.2 h of the data protection regulation, sensitive may personal data is processed despite the prohibition in Article 9.1 if the processing is necessary for reasons related to, for example, preventive healthcare,

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 Municipal Act is an example of national law referred to in Article 9.2 h.

The Health and Medical Services Board is responsible according to ch. 10. Section 8 of the Municipal Act on quality

in the business even if the execution of the care has been handed over by contract to

MedHelp AB in accordance with ch. 15 § 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 is necessary in the way that

referred to in Article 9.2 h of the data protection regulation. The provision in ch. 25 § 1 OSL re

duty of confidentiality for persons active in healthcare constitutes a legally regulated

confidentiality that meets the requirement in Article 9.3 that the personal data is processed by or

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

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

the healthcare area must be permitted with the support of Article 9.2 h of the data protection regulation.

HSL's and the Municipal Act's regulations on care providers as well as control and

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

covered the relationship with the IT operation supplier and IMY therefore does not take any action in this matter

some further investigation measures in regard to calls to 1177 and with what support i

national law under which the IT service provider processes personal data. IMY can, however

state that since January 1, 2021, the IT operations provider's staff is subject to

a statutory duty of confidentiality in accordance with § 4 of the Act on confidentiality at

outsourcing of technical processing or storage of data, as per § 1

applied when an authority instructs a company or another individual

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

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

7(11)

which a service provider takes under the aforementioned law may be security-enhancing measures such as pseudonymisation (prop. 2019/20:201 p. 22).

The region's information for care seekers

In the data protection regulation there are far-reaching obligations to provide information to registered. The personal data controller is responsible for the information provided.

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

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

IMY's assessment

On 25 June 2019, IMY received a transcript from [www.1177.se](http://www.1177.se) about 1177 healthcare advice by phone. The website states that behind 1177 Vårdguiden the Swedish healthcare through all regions is in collaboration. 1177 is a national phone number for healthcare advice that you can call 24 hours a day. Each region runs its own healthcare consultancy business 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?" are answered as follows. "It is your healthcare provider who is responsible for ensuring that the personal data is handled correctly and legal way. 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 businesses that provide care that are responsible."

The obligation to provide information is extensive and a fundamental prerequisite for individuals must be able to have knowledge of and control over how their personal data is processed treated. The requirement of transparency is a fundamental principle according to Article 5.1 a i data protection regulation. Reason 60 in the data protection regulation states that the principles if fair and open treatment requires that the data subject be informed that processing takes place and the purpose of it. The personal data controller should to it Data subjects provide all additional information required to ensure a fair and open processing, taking into account the specifics of personal data processing circumstances and context.

According to Article 12.1 of the Data Protection Regulation, the person in charge of personal data shall take appropriate measures to provide to the data subject all information according to articles 13 and 14 in a concise, clear and distinct, comprehensible and easily accessible form, with use of clear language, especially for information that is specifically targeted to children. Article 13 specifies the information that the personal data controller must provide if the personal data is collected from the data subject. Article 14 states the information that the personal data controller must provide about the personal data has been collected from a source other than the registered one.

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

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

8(11)

the personal data controller request access to personal data. If appropriate information must be given about contact details for the data protection officer.

The Health and Medical Services Board collects the telephone numbers of care seekers and municipality ID for the purpose of ensuring that calls to 1177 are taken care of by the care provider MedHelp AB. From MedHelp AB, the committee collects call information such as pseudonymised for follow-up and quality purposes. Health and the health care board admits a lack of transparency in relation to registered users. IMY states that according to articles 13 and 14 of the data protection regulation, extensive requirements for information to registered persons that the Health and Medical Board does not leaves. It is not enough that the committee informs on the website 1177.se that "It is your healthcare provider who is responsible for ensuring that the personal data is handled correctly and lawful manner."

For example, there is no information that the Health and Medical Board is personal data controller, about the committee's contact details, about the purpose of the processing, about the legal basis for the processing and whether there is a right to request access to personal data from the person in charge of personal data. It's missing also contact details for the data protection officer.

By the Health and Medical Board not informing care seekers in connection with the collection of phone numbers and municipality IDs when the care seeker calls to 1177 or the later collection of call information from MedHelp AB, IMY notes that the Health and Medical Services Board has processed personal data in conflict with articles 13 and 14 of the data protection regulation regarding the information that must automatically submitted to registered users. The population in Stockholm County was 2,391,990 quarters 4 2020.4 The lack of information can thus affect a very large number care seeker.

Article 5.1 a of the data protection regulation states that personal data must be processed in a legal, accurate and transparent manner in relation to the data subject. Absence of information according to Articles 13 and 14 is deemed to be so extensive and serious that it

considerably limits care-seekers' possibilities to take advantage of their rights. IMY does therefore the assessment that it is also a question of a violation of the principle of openness i

Article 5.1 a.

Choice of intervention

Possible intervention measures regarding information for care seekers

The IMY has a number of corrective powers available under Article 58.2 i the data protection regulation, among other things IMY can submit to the personal data controller to ensure that the processing takes place in accordance with the regulation and if required in one specific way and within a specific period.

According to articles 58.2 and 83.2 of the data protection regulation, IMY has the authority to impose administrative penalty fees in accordance with Article 83. Depending on the circumstances of the individual case, administrative penalty fees must be imposed in addition to or instead of the other measures referred to in Article 58.2.

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

Total (scb.se)

4

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

9(11)

Furthermore, Article 83.2 of the data protection regulation states which factors must be taken into account when deciding that administrative penalty fees are to be imposed and when determining the amount of the fee. If it is a question of a minor violation, IMY receives according to what stated in recital 148 of the Data Protection Regulation instead of imposing a penalty fee issue a reprimand according to article 58.2 b. Consideration must be given to aggravating circumstances and

mitigating circumstances of the case, such as the nature of the violation, degree of severity and duration as well as previous violations of relevance.

According to Article 83.7, the member states may establish rules for 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 a sanction fee by an authority for violations referred to in article 83.4, 83.5 and

83.6 of the data protection regulation. In that case, Article 83.1, 83.2 and 83.3 shall be applied.

A penalty fee must be imposed

IMY has assessed above that the Health and Medical 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 in lieu of, other corrective measures.

Against the background of the established violations concerning deficiencies 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 question of a minor violation.

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

Determining the size of the penalty fee

General provisions

According to Article 83.1 of the Data Protection Regulation, each supervisory authority must ensure that the imposition of administrative penalty charges on a case-by-case basis is effective;

proportionate and dissuasive. Article 83.2 specifies the factors to be taken into account when

determining the size of the penalty fee for the violation. At the assessment

of the size of the penalty fee, account must be taken of, among other things, the violation

nature, severity and duration, whether it was a matter of intent or

negligence, what steps were taken to mitigate the damage they recorded



has suffered, the degree of responsibility taking into account the technical and organizational measures carried out in accordance with articles 25 and 32, how the subject of supervision has cooperated with the supervisory authority, which categories of personal data are affected, how the violation came to IMY's attention and whether there are other aggravating circumstances or mitigating factor such as direct or indirect financial gain from the procedure.

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 which referred to in Article 83.4 of the Data Protection Ordinance and to a maximum of SEK 10,000,000 when violations referred to in article 83.5 and 83.6. Violations of Articles 5, 13 and 14 is covered by the higher penalty fee according to Article 83.5.

Assessment of mitigating and aggravating circumstances

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

10(11)

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 lead to an extensive processing of sensitive and privacy-sensitive personal data, such as the care seeker who calls 1177 cannot oppose. There is, however, 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 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 seekers in connection with

the board's processing of personal data.

It is aggravating that the lack of information is very extensive, lasting and concerning

large number of care seekers who can contact 1177 without them receiving information about

among other things, the Health and Medical Services Board and the Data Protection Officer

contact details. The lack of such contact information limits the care seeker's

opportunities to exercise their rights, such as requesting access to the personal data i

afterwards. It is also aggravating that information is not provided about the collection of

tasks are carried out for the purpose of ensuring that calls to 1177 are taken care of by the care provider

MedHelp AB and about the collection of call information from MedHelp AB for

follow-up and quality purposes.

For penalty fees to be effective, dissuasive and proportionate must

a balanced 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 Board should

pay an administrative sanction fee of 500,000 (five hundred thousand) kroner for them

noted the deficiencies in information for care seekers.

Order

The Health and Medical Services Board has not informed care seekers in accordance with the requirements in

data protection regulation. There is a large amount of residents who can contact 1177 and

which can be affected by the lack of information about, among other things, who is

personal data controller and his contact details. The lack of such

contact information limits the care seeker's opportunities to, for example, exercise the right

to request access to personal data.

The health care board must therefore be referred according to article 58.2 d i

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 regard takes place in accordance with

the data protection regulation in the manner set out in the decision.

The Swedish Privacy Protection Authority

Diary number: DI-2019-7321

Date: 2021-06-07

11(11)

This decision has been taken by the general manager Lena Lindgren Schelin after a presentation

by department director Suzanne Isberg. In the proceedings, the lawyer Mattias has

Sandström and unit manager Katarina Tullstedt participated. At the final

IT security specialist Magnus Bergström, the head of court, is also handling the case

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 Swedish Privacy Agency. Enter in

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 Privacy 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 information that may be covered by

secrecy. The authority's contact details appear on the first page of the decision.

Copy to

The data protection officer.

Appendix

Appendix – Information on payment of penalty fee.