

**Information for health professionals on the processing of
personal data in the cross-border transfer of personal data
via the National Contact Point for eHealth (SiNCP)**

Health professionals abroad

1. Purpose of this document

This document has been drawn up for health professionals in other EU countries who take part in the cross-border transfer of electronic health data. These are:

- doctors who issue a patient in another EU country with an electronic prescription for medicine that the patient can then receive at a pharmacy in Slovenia;
- doctors who access a Patient Summary in the course of treating a patient from Slovenia;
- pharmacists who dispense prescription medicine at a pharmacy in another EU country on the basis of an electronic prescription brought by the patient from Slovenia.

This document is designed to provide details of how the personal data of health professionals from other EU countries is processed in the course of cross-border transactions involving electronic prescriptions and Patient Summaries.

2. What is the eHealth Digital Service Infrastructure?

The eHealth Digital Service Infrastructure (eHDSI or eHealth DSI) is an information and communication infrastructure that enables safe and simple access to a patient's health data in the case of medical treatment or the dispensation of medicinal products in pharmacies when the patient is receiving healthcare or medicinal products outside their country of origin. The data can be accessed at any time by health professionals anywhere in the EU.

The cross-border exchange of health data takes place via a network of secure communication hubs known as National Contact Points for eHealth (NCPeH), which are managed by Member States. Every EU Member State is responsible for managing personal data in its territory.

The National Contact Point for eHealth in Slovenia is called **SiNCP**. The authorised administrator of SiNCP is the National Institute of Public Health (NIJZ), which is also the controller responsible for processing personal data in the context of cross-border exchange.

The transmission, recording and storing of your personal data in the context of cross-border exchange is carried out in accordance with the General Data Protection Regulation and the national legislation of the Member States participating in the cross-border exchange.

3. What categories of personal data are processed within the eHDSI?

1) Patient Summary

The Patient Summary is a collection of basic health data essential for ensuring that a patient receives high-quality and safe healthcare provision. It contains the most important information, such as allergies, current medication, current and previous illness, past medical procedures and vaccinations. The data is collected in the patient's home country and transferred to other EU countries so that it is available to healthcare providers abroad, should the patient receive treatment in another country.

In Slovenia the Patient Summary comprises records placed in the Central Register of Patient Data (CRPP) by various entities. It is produced automatically within the information system maintained by the National Institute of Public Health (NIJZ) and digitally signed using the NIJZ's system-wide digital certificate. Because of the way it is produced, it contains no personal data on health professionals.

In other EU countries, the Patient Summary may contain data on its author(s).

2) *Electronic prescriptions and the dispensing of medicines* – Data on medicines prescribed in the patient's home country that is transferred to other EU countries so that the patient can receive those medicines at any pharmacy. In addition to information on the prescribed medicines, the electronic prescription also contains information on the prescriber. The electronic medicine dispensing record contains information on the dispenser of the medicine (pharmacist).

The electronic prescriptions and medicine dispensing records transferred from Slovenia to other EU countries originate in the eRecept (ePrescription) IT system that operates within the national eZdravje (eHealth) system.

NOTE: If you access a Patient Summary for a patient from Slovenia in the course of treating them or dispense medicine at a pharmacy on the basis of a prescription issued in Slovenia, your personal data will be processed in Slovenia in compliance with the General Data Protection Regulation (GDPR) and Slovenian national legislation. The same applies when you produce an electronic prescription on the basis of which a patient receives medicine in Slovenia.

For more information on how your personal data is processed in cross-border transactions via the eHDSI for patients from Slovenia, contact the administrator of the National Contact Point for eHealth, i.e. the NIJZ (email: vop@nijz.si).

4. What is the legal basis for using your personal data?

The authorised institutions of EU Member States have signed the 'Agreement between National Authorities or National Organisations responsible for National Contact Points for eHealth'. This agreement sets out the criteria that Member States must meet in order to participate in cross-border eHealth information services, including data protection obligations.

In Slovenia the data of a health professional who takes part in the provision of health services to a patient/user of cross-border eHDSI services is processed in compliance with the [Healthcare Databases Act \(Uradni list RS, Nos 65/00, 47/15, 31/18\)](#) and the [Rules on the classification, prescribing and dispensing of medicinal products for human use \(Uradni list RS, Nos 86/08, 45/10, 38/12, 17/14 \[ZZdr-2\]\)](#).

5. What is the purpose of personal data processing?

Your personal data will be used in Slovenia exclusively for the purpose of providing health services or dispensing medicines within the eHDSI. Your data will not be used for secondary purposes in Slovenia.

6. Who has access to your data? (recipients of personal data)

Your personal data will be accessible to those legally entitled to access it in Slovenia (controllers and processors) if you receive a Patient Summary from Slovenia or if you dispense medicine to a patient on the basis of a prescription issued in Slovenia. Your personal data will also be processed abroad if you issue a prescription in your home country on the basis of which a patient receives medicine at a pharmacy in Slovenia.

All recipients of data involved in these processes are responsible for ensuring that the data is processed within the limits of their authorisations. The following are entitled to process data in the cross-border transfer of data:

- the healthcare provider (institution) at which the patient receives health provision that involves reference to the Patient Summary;
- the pharmacy that dispenses the prescription medicine;
- the national contact point in the patient's country of origin;
- the national contact point of the country in which the health service is provided or the prescription medicine dispensed.

7. Types of personal data and scope of processing

If you receive a Patient Summary from abroad in the course of treating a patient from Slovenia or dispense medicine to that patient on the basis of a prescription issued in Slovenia, your personal data and the data of the healthcare institution or pharmacy will be processed in Slovenia, as follows:

- your name and surname;
- your profession or professional title (doctor, pharmacist);
- the name of healthcare institution or pharmacy.

If you issue an electronic prescription in your home country on the basis of which a patient receives medicine at a pharmacy in Slovenia, your contact details and the digital signature details will also be processed in Slovenia, as follows:

- the contact details of the doctor that issued the prescription (e.g. email, telephone number);
- the name and address of the healthcare provider (institution) at which the prescription was issued;
- the digital signature with details on the digital certificate.

For more information on how your personal data is processed in cross-border transactions via the eHDSI in Slovenia, contact the administrator of the National Contact Point for eHealth, i.e. the NIJZ (email: vop@nijz.si).

8. Where and for how long is your personal data stored?

The personal data of health professionals involved in cross-border transfers is stored at the National Contact Point for eHealth (SiNCP) for five years after the end of the calendar year in which the transaction was carried out (access to the Patient Summary or the dispensing of medicines on the basis of an electronic prescription).

Data on prescriptions at pharmacies in Slovenia is also stored locally in those pharmacies' own information systems. The minimum period of storage is laid down in the [Rules on the classification, prescribing and dispensing of medicinal products for human use](#), and depends on the type of medicine prescribed (three or five years). The maximum period of storage is 15 years.

9. Your rights

You can obtain information on the processing of your personal data in Slovenia from the National Institute of Public Health (NIJZ), the administrator of the National Contact Point for eHealth (email: vop@nijz.si).

You can obtain information on the processing of your personal data in other EU Member States from the administrators of their National Contact Points for eHealth (https://health.ec.europa.eu/ehealth-digital-health-and-care/electronic-cross-border-health-services_en#which-services-are-available-in-which-countries).

You have the right to submit a complaint to the supervisory authority in your country of origin or in Slovenia. The supervisory authority in Slovenia is the Information Commissioner (<https://www.ip-rs.si/>).

Contact details of the supervisory authorities of other EU Member States are available on the website of the European Data Protection Board: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

Contact details:

Administrator of eHealth and National Contact Point in Slovenia

NIJZ

Trubarjeva 2

SI-1000 Ljubljana

e: ezdravje@nijz.si

www: <https://ezdrav.si/en/solutions/sincp/>

Personal data protection officer at the administrator of the National Contact Point for eHealth

e: vop@nijz.si

Personal data protection supervisory authority (Information Commissioner)

e: gp.ip@ip-rs.si