

Notice to patient on cross-border processing of personal data via the National Contact Point for eHealth (SiNCP)

Patients receiving prescription medicines in Slovenia

The purpose of this notice is to inform patients travelling to Slovenia about the processing of their personal data.

1. 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.

2. What categories of personal health data are processed?

Electronic prescription and dispensation of medicinal products (ePrescription and eDispensation)

A healthcare provider in your country of affiliation issues an electronic prescription for a medicinal product, which can be dispensed to you in a pharmacy in another EU Member State. The electronic prescription (ePrescription) contains exactly the same information as a standard paper prescription, including details identifying the doctor and the patient and details of the prescribed medicinal product.

The electronic dispense record contains data identifying the pharmacist and data on the medicinal product dispensed.

3. What is the legal basis for the processing of your personal data?

The authorised institutions of EU Member States have signed an "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.

The legal basis for processing your data in Slovenia is the [Healthcare Databases Act \(Uradni list Republike Slovenije \[Official Gazette of the Republic of Slovenia\] \(UL RS\), Nos 65/00, 47/15, 31/18\)](#).

The legal basis for the transmission of your data from your country of origin is the applicable legislation of your country of origin. If your data are transmitted to Slovenia on the basis of your consent, you must give your consent in your country of origin.

4. What is the purpose of processing?

Your health data will be used in Slovenia exclusively for the purpose of the dispensation of medicinal products.

5. Who processes and has access to the data? (recipients of personal data)

Authorised data processors in Slovenia are:

- the pharmacy where your medicinal products are dispensed,
- the National Institute of Public Health (NIJZ), as the administrator of information and communication infrastructure and eHealth solutions and the administrator of the National Contact Point for eHealth (SiNCP).

Only authorised health professionals involved in the dispensation of medicinal products to you will have access to your personal data in Slovenia.

In Slovenia, access to the ePrescription is only granted to pharmacists who log in to their respective information systems using an electronic identity (digital certificate, professional card).

6. Where and how long are personal data stored?

Data on the ePrescription and the dispensation of a medicinal product in Slovenia are stored in the national eHealth system for 5 years after the end of the calendar year in which the dispensation took place.

Data on the ePrescription and the dispensation of a medicinal product in Slovenia are also stored in the pharmacy that dispensed the medicinal product to you. The minimum storage period is defined in the [Rules on the classification, prescribing and dispensing of medicinal products for human use](#) and depends on the type of medicinal product (3 or 5 years respectively). The maximum storage period is 15 years.

Details of transactions (log of consultations or audit trail) are stored within the national eHealth infrastructure for five years after the end of the calendar year in which the transaction took place.

7. 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).

If you believe that your data in the ePrescription are inaccurate, contact the administrator of the National Contact Point for eHealth, i.e. the NIJZ (email: vop@nijz.si).

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