

Annex 4c: Nordic health data landscape analysis tables

Disclaimer: This mapping is illustrative only and does not constitute a determination that any listed organisation is, or is not, a health data holder under Regulation (EU) 2025/327. Each organisation remains responsible for assessing its status and compliance obligations for each dataset and processing context, including whether it acts as a controller or joint controller for personal electronic health data under Articles 2(1)(a) and 2(2)(t), whether it controls the availability of non-personal electronic health data, and the controllership rules in Article 74. Natural persons and microenterprises are exempt from the Chapter IV health data holder obligations under Article 50(1), unless a Member State extends those obligations pursuant to Article 50(2). Final national legislation, implementing acts, contractual arrangements and actual processing roles may affect the assessment.

Denmark

Minimum categories of electronic health data for secondary use (EHDS Art. 51):

- (a) electronic health data from EHRs;
- (b) data on factors impacting on health, including socioeconomic, environmental and behavioural determinants of health;
- (c) aggregated data on healthcare needs, resources allocated to healthcare, the provision of and access to healthcare, healthcare expenditure and financing;
- (d) data on pathogens that impact human health;
- (e) healthcare-related administrative data, including on dispensations, reimbursement claims and reimbursements;
- (f) human genetic, epigenomic and genomic data;
- (g) other human molecular data such as proteomic, transcriptomic, metabolomic, lipidomic and other omic data;
- (h) personal electronic health data automatically generated through medical devices;
- (i) data from wellness applications;
- (j) data on professional status, and on the specialisation and institution of health professionals involved in the treatment of a natural person;
- (k) data from population-based health data registries such as public health registries;
- (l) data from medical registries and mortality registries;
- (m) data from clinical trials, clinical studies, clinical investigations and performance studies subject to Regulation (EU) No 536/2014, Regulation (EU) 2024/1938 of the European Parliament and of the Council (35), Regulation (EU) 2017/745 and Regulation (EU) 2017/746;
- (n) other health data from medical devices;
- (o) data from registries for medicinal products and medical devices;
- (p) data from research cohorts, questionnaires and surveys related to health, after the first publication of the related results;
- (q) health data from biobanks and associated databases.

Publisher type group	Data holder	Original data source name (ENG)	Original Data source name (national language)	Dataset name (ENG): candidate as entry in nHDC	Possible sub-datasets	Comments	Link to further information/metadata	Questions/unclear	NA Probably not included in EHDS	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
National authority	Sundhedsdatastyrelsen	Danish Patient Registry	Landspatientregisteret	Danish Patient Registry		This registry will be published in the Danish metadata Catalog with metadata on registry, table and variable level	https://sundhedsdatabank.dk/behandling-og-pleje/ventetid https://sundhedsdatabank.dk/behandling-og-pleje/udredningsret https://sundhedsdatabank.dk/behandling-og-pleje/sygehus													X						
National authority	Sundhedsdatastyrelsen	Danish Cancer Registry	Cancerregisteret	Danish Cancer Registry		This registry will be published in the Danish metadata Catalog with metadata on registry, table and variable level	Kræft - Sundhedsdatabanken													X						
National authority	Sundhedsdatastyrelsen	The Cause of Death Register	Dødsårsagsregisteret	The Cause of Death Register		This registry will be published in the Danish metadata Catalog with metadata on registry, table and variable level	Livets afslutning - Sundhedsdatabanken														X					
National authority	Sundhedsdatastyrelsen	The Clinical Laboratory Information Register	Laboratoriedatabasen	The Clinical Laboratory Information Register		This registry will be published in the Danish metadata Catalog with metadata on registry, table and variable level	Findes ikke endnu																		X	
Public health institute	Statens Serum Institut	The Danish Vaccination Registry	Det Danske Vaccinationsregister	The Danish Vaccination Registry		This registry will be published in the Danish metadata Catalog with metadata on registry, table and variable level	Tilgængelige data													X						
Public health institute	Statens Serum Institut	Covid-19 Test Responses	Covid-19 testsvar	Covid-19 Test Responses		This registry will be published in the Danish metadata Catalog with metadata on registry, table and variable level	Tilgængelige data													X						

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Finland

Minimum categories of electronic health data for secondary use (EHDS Art. 51):

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- (d) data on pathogens that impact human health;
- (e) healthcare-related administrative data, including on dispensations, reimbursement claims and reimbursements;
- (f) human genetic, epigenomic and genomic data;
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- (h) personal electronic health data automatically generated through medical devices;
- (i) data from wellness applications;
- (j) data on professional status, and on the specialisation and institution of health professionals involved in the treatment of a natural person;
- (k) data from population-based health data registries such as public health registries;
- (l) data from medical registries and mortality registries;
- (m) data from clinical trials, clinical studies, clinical investigations and performance studies subject to Regulation (EU) No 536/2014, Regulation (EU) 2024/1938 of the European Parliament and of the Council (35), Regulation (EU) 2017/745 and Regulation (EU) 2017/746;
- (n) other health data from medical devices;
- (o) data from registries for medicinal products and medical devices;
- (p) data from research cohorts, questionnaires and surveys related to health, after the first publication of the related results;
- (q) health data from biobanks and associated databases.

Publisher type group	Data holder	Original data source name (ENG)	Original Data source name (national language)	Dataset name (ENG): candidate as entry in nHDC	Possible sub-datasets	Comments	Link to further information/meta data	Questionnaire	A	E	C	D	E	F	G	H	I	J	K	L	M	N	O	P
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Publi sher type grou p	Data holder	Original data source name (ENG)	Original Data source name (national language)	Dataset name (ENG): candidat e as entry in nHDC	Possib le sub- databse ts	Comments	Link to further information/metadata	Ques tions/ uncle ar	N A Pr ob ab ly no t in cl ud ed in E H D S	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
Gove rnme nt and public secto r organ isatio n	Direct orate of Health	Hospital discharg e register	Vistunarskrá heilbrigðisstofnan a	Hospital discharg e register	TBD	Data available for scientific research. Recent law changes will result in the merging of the hospital discharge register, the register of primary healthcare contacts as well as the register of contacts with medical specialists in private practice.	https://island.is/en/gagnasofn-embaettis-landlaeknis Variable list: https://assets.ctfassets.net/8k0h54kbe6bj/7wlyljY8SbaYt8rD7YEFLLW/1151f880801de3de9c3bc439decf8fde/Vistunargrunnur_breytulisti_09.2020.xlsx			X	X (P arti al, the pro visi on of he alt hc are incl ud ed)								X	X						
Gove rnme nt and public secto r organ isatio n	Direct orate of Health	Prescrip tion medicin es register	Lyfjagagnagrunnur	Prescrip tion medicin es register	TBD	Data available for scientific research	https://island.is/en/gagnasofn-embaettis-landlaeknis Variable list: https://assets.ctfassets.net/8k0h54kbe6bj/77iLMCpZQaMoksn8Wba5C3/244fd842ed0a583223c79a5fa2ab1576/Lyfjagagnagrunnur_Breytulisti.a.vef_LOKA_21.1.2019.xlsx				X (P arti al, the pro visi on of he alt hc are incl		X						X	X pa rti all y			X			

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Not-for profit organisation	The Icelandic Heart Association	AGES phase 1. AGES Reykjavik Study: The Reykjavik Study of Healthy Aging for the New Millennium	AGES - Reykjavíkurrannsóknin	AGES - Reykjavík Study	TBD	Extension of Reykjavík Study cohort, 2002–2006, n=5,764 survivors. Adds genetic, imaging and biobank data.	https://hjarta.is/en/research/ages-phase-1/							X							X
Administrative institution	Iceland Health (Sjúkratryggingar Íslands)	Healthcare reimbursement and claims data	Greiðslupátttökugögn og kröfugögn	Healthcare reimbursement and claims data	TBD	Iceland Health is the universal health insurance agency for Iceland, whose main task is to contract and pay for all healthcare covered by the insurance — including hospitals, primary healthcare, nursing homes, medical specialists, dentists, and other healthcare professionals. Its drug reimbursement records also complement the Prescription Medicines Register already in the inventory.	https://island.is/en/o/iceland-health							X							
Administrative institution	Social Insurance Administration (Tryggingarstofnun)	Social insurance and disability data	Gögn um almannatryggingar og örorku	Social insurance and disability data	TBD	Administers disability pensions, sickness cash benefits, and rehabilitation payments	https://island.is/en/o/social-insurance-administration							X							

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Norway

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Publi sher type grou p	Data hold er	Orig inal data sour ce nam e (ENG)	Orig inal Data sour ce nam e (nati onal lang uag e)	Datas et name (ENG) : candi date as entry in nHDC	Possible sub- datasets	Comments	Link to further information/metadat a	Questions/unclear	NA	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
Gove rnme nt and public secto r organ isatio n	Nor wegi an Instit ute for Publi c Heal th	Nor wegia n Patie nt Regi stry	Nors k pasi entr regist er	About the report ing		We share subdatasets as distributions today	https://helsedata.no/en/variables/?datasamling=K_NPR.INNRAPPORTERING	Maybe the dataset name would need to include "Norwegian Patient Registry" for more clarity?						X						X						

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Government and public sector organization	Norwegian Institute for Public Health	Norwegian Patient Registry	Norsk pasientregister	Personal injury and accident data		We share subdatasets as distributions today	https://helsedata.no/en/variables/?datasamling=K_NPR.FMDS	The register contains health information on everyone who has been referred for or has received treatment in the specialist healthcare services. NPR has personal, administrative, social, and medical information from the following service areas: Somatic hospitals and clinics Mental healthcare for adults Mental healthcare for children and adolescents Private contract specialists, somatic disciplines Private contract specialists, mental healthcare Interdisciplinary specialized treatment for substance abuse In addition, NPR has information about: Waiting list and patient rights Injury and accident data Emergency medical communication centers (AMK) Mapping of substance abuse situation at the start of treatment (within substance abuse treatment) Private rehabilitation clinics Nursing homes in Finnmark NPR has personally identifiable information from 2008.		X		X					X		
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- (j) data on professional status, and on the specialisation and institution of health professionals involved in the treatment of a natural person;
- (k) data from population-based health data registries such as public health registries;
- (l) data from medical registries and mortality registries;
- (m) data from clinical trials, clinical studies, clinical investigations and performance studies subject to Regulation (EU) No 536/2014, Regulation (EU) 2024/1938 of the European Parliament and of the Council (35), Regulation (EU) 2017/745 and Regulation (EU) 2017/746;
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Publisher group	Data holder	Original data source name (ENG)	Original Data source name (national language)	Dataset name (ENG): candidate as entry in nHDC	Possible sub-datasets	Comments	Link to further information/metadata	Questions/unclear	NA	A	E	C	D	E	F	G	H	I	J	K	L	N	C	P	G
									Probably not included in EHDS																
National authority	Swedish National Board of Health and Welfare	National Patient Register	Patientregistret	National Patient register, In-patient care	Maybe split into historic (pre 1987) and current (nationwide coverage from 1987) for more clear metadata description	We are contemplating to share each subregister within a register as a dataset on its own and link them through keywords and/or concatenation of title of main and sub dataset, instead of using dataset series or catalogue or distributions	National Patient Register - Socialstyrelsen			(X)				(X)					(X)	X					
National authority	Swedish National Board of Health and Welfare	National Patient Register	Patientregistret	National Patient register, Specialised out-patient care		We are contemplating to share each subregister within a register as a dataset on its own and link them through keywords and/or concatenation of title of main and sub dataset, instead of using dataset series or catalogue or distributions	National Patient Register - Socialstyrelsen			(X)				(X)					(X)	X					
National authority	Swedish National	National Patient Register	Patientregistret	National Patient register,		Data collection has not begun but will be available during EHDS period	National Patient Register -			(X)				(X)					(X)	X					

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