



Väylävirasto
Trafikledsverket

10 May 2024

Privacy statement, The Finnish Transport Agency's external e-learning environment

This privacy statement describes the purposes for which your personal data is processed and the rights you have as a data subject. This privacy statement applies to the personal data processed in the Finnish Transport Infrastructure Agency's external e-learning environment.

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1 Data controller and data protection officer

Controller	Contact	Data protection officer
Finnish Transport Infra-structure Agency P.O. Box 33 FI-00521 Helsinki kirjaamo@vayla.fi Tel. +358 295 34 3000	Risto Lappalainen Tomi Kangas kirjaamo@vayla.fi	Tomi Lapinlampi kirjaamo@vayla.fi

2 Purpose of personal data processing

The purpose of personal data processing is to enable the smooth completion of online training courses and the printing of course certificates for the employees of the service providers and stakeholders of the Finnish Transport Infrastructure Agency. The Finnish Transport Infrastructure Agency does not keep a register of the training completed and does not keep course certificates. Through online courses, the Finnish Transport Infrastructure Agency maintains, develops and ensures the skills of those working in the transport infrastructure network.

All courses can be completed without processing personal data (by logging in as a visitor).

The Finnish Transport Infrastructure Agency requires its service providers to hold certain qualifications for certain jobs by means of contracts and guidelines. The employer is responsible for maintaining the qualifications of the service providers' employees, and is also responsible for ensuring that it employs qualified persons for the tasks covered by the contract. The certificates obtained from online courses provided by the Finnish Transport Infrastructure Agency allow a person to prove to their employer or another party that they have completed the training.

The Finnish Transport Infrastructure Agency processes the personal data of training participants only for the purposes necessary for the administration of training, printing of course certificates and support services.

3 Basis for the processing of personal data

The processing of personal data is necessary for the performance of a task carried out in the public interest (as laid down in Article 6(1)(e) of the General Data Protection Regulation). According to Section 1 of the Act on the Finnish Transport Infrastructure

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Agency (862/2009), the agency is a central government agency that operates in the administrative branch of the Ministry of Transport and Communications. In its role as the transport infrastructure manager, the agency is responsible for maintaining and developing the service level of roads, railways and waterways on traffic routes controlled by the central government. Through its activities, the Finnish Transport Infrastructure Agency promotes the functionality of the transport infrastructure network and traffic safety. Online training is one way of carrying out the agency's statutory functions. The processing of personal data in online courses is necessary to ensure that the training is smooth for the user and that they can obtain a certificate for the course they have completed. The agency does not retain any data relating to course performance after this processing need has ended. Therefore, the processing of personal data in online training is proportionate and necessary for the performance of a task carried out in the public interest by an authority (Section 4, Paragraph 2 of the Data Protection Act).

4 The personal data to be processed

Learners register for the e-learning environment with their name and email address. No other personal data is required. The following data relating to the completion of training courses and the use of the service is processed for a logged-in user (Learner):

- Learner's **IP address, Service's user data**: Detecting and addressing errors and abuses to ensure the availability of the service. Anonymisation of certain personal data in order to generate statistics on the use of the service and on the overall performance of Learners associated with a particular controller.

The Learner can save a course certificate in PDF format for the course they have completed, showing their first name, surname, the course completed and the date of completion. Certificates are not stored in the service. It is the responsibility of the Learner themselves to keep an otherwise process their certificates.

In addition, the personal data of Trainers/Instructors is processed in the same way as that of individual Learners.

For the **visitor-user**, the **IP address** and **service user data** are processed to detect and address errors and abuses in order to ensure the availability of the service.

The provider of the e-learning environment (Workseed Oy) also collects and processes data that does not allow the identification of individual users. In addition, Workseed anonymises some data, and collects general statistics that do not contain personal data. This anonymous information or statistical data may be used to develop Workseed's services and to analyse the use of the service. Workseed uses cookies, which are used for

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performance statistics. The statistics are only used to measure and analyse the performance of the platform.

5 Storage period of personal data

The data subject's data is stored for a maximum of three (3) months from registration, after which it is automatically erased. After this period, the agency does not keep course certificates or any other personal data related to the training.

6 Regular sources of data

Personal data is obtained from the data subject when they register for the e-learning environment. The person themselves is responsible for the accuracy and maintenance of their data.

7 Personal data recipients

Personal data is processed on behalf of the Finnish Transport Infrastructure Agency by the e-learning environment service provider Workseed Oy under the conditions agreed in the contract.

The agency does not regularly disclose personal data related to training to any third party. Personal data is disclosed to the authorities requesting it in accordance with the Act on the Openness of Government Activities. The data and documents are public. With regard to personal data, the Finnish Transport Infrastructure Agency assesses, based on the Act on the Openness of Government Activities, whether the recipient of the data has the right to store and use such personal data in accordance with the provisions on the protection of personal data.

Personal data will not be disclosed for direct marketing or for opinion or market research purposes, unless specifically provided for this purpose.

The data subject can use the course certificate to prove completion of the course to their employer or any other party of their choice.

8 Transfers of data outside the EU or EEA

Personal data is not transferred outside the European Union or the European Economic Area.

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9 Rights of data subjects

You have the right to know whether we process personal data about you and the right to receive a copy of your personal data (Article 15 of the General Data Protection Regulation).

You have the right to ask us to rectify any incorrect details in your personal data (Article 16 of the General Data Protection Regulation).

Under Article 18 of the General Data Protection Regulation, you have the right to restrict the processing of your personal data in the following situations:

- you have disputed the accuracy of your personal data and want the processing of your personal data to be restricted for the duration of the verification
- your data is being processed in an unlawful manner but you do not want your data to be erased;
- FTIA no longer requires the personal data in question, but you require it for the establishment, exercise or defence of legal claims
- you have objected to the processing of your personal data pending the verification whether the interests of FTIA override yours.

FTIA does not make decisions based on automatic decision-making, such as profiling.

You can submit a request regarding your rights to the Transport Infrastructure Agency by email or mail. Contact information can be found in section 1.

Information and measures shall be free of charge for the data subject, unless the requests are manifestly unfounded or unreasonable, in particular where they are submitted repeatedly.

You have the right to lodge a complaint with the supervisory authority if you consider the processing of personal data concerning you to be in violation of applicable data protection regulations. In Finland, the supervisory authority is the Data Protection Ombudsman ([Office of the Data Protection Ombudsman](#)).