

#### **Data Controller**

Finnish Transport Infrastructure Agency PO Box 33 00521 Helsinki

# **Contact person regarding register issues**

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## **Data Protection Officer**

Tomi Lapinlampi kirjaamo@ftia.fi

## Name of data register

Feedback systems of the Finnish Transport Infrastructure Agency

## Purpose of processing personal data

Performance of official duties, including the customer advice provided by the Finnish Transport Infrastructure Agency and the ELY Centres' area of responsibility, Transport, as well as handling of customer feedback.

The purpose of the feedback system is to receive feedback, questions and suggestions for improvement as well as reports on roads, railways and waterways.

The submitters of feedback are not asked to give any personal data, and feedback may be submitted anonymously or using a signature. If customers have provided their contact information, they may receive a reply and, if necessary, be contacted further. The email address and all other submitted contact information are only used for replies. It is also possible for the user to receive an alert by email, via which they may check the process status of their feedback. The authenticity of the personal data submitted by the users is not verified.

The feedback and the feedback response, as well as the contact information and appendices that the feedback submitter may have attached to the feedback, is saved in the system. Feedback regarding sensitive data will be given limited visibility, and issues that belong to other processes and systems will be transferred.

Reports and feedback on route conditions are forwarded to the Finnish Transport Infrastructure Agency's regional contractors (in the Harja system), who then decide on the action to be taken based on the quality requirements set for the route. In the agreements entered into between the Finnish Transport Infrastructure Agency/ELY Centres and the regional contractors, it has been agreed that the contractor may contact the submitter of feedback directly, if necessary.

In the electronic feedback channels, submitters of feedback may be requested to give their consent to publish the feedback. If they have given their consent, the feedback as well as the response may be published. Consent to publish means that the Finnish Transport Infrastructure Agency has the unlimited right to use, edit, transfer and publish the feedback in any way that the Finnish Transport Infrastructure Agency desires.

Feedback and feedback responses that have been defined as public in the feedback system, and that have been published in various web services, may be viewed via the REST interface (a so-called Open311 interface). Public feedback and responses may be published in other web services as well. No personal data connected to the feedback is published via the interface. The system's primary user approves the web services that transmit feedback to the system via the interface by using a separate ID key.

## **Contents of the register**

The register of the feedback system includes:

- feedback submitted by users
- feedback submitted to the system on behalf of users
- user's name or signature, if given
- user's phone number, if given
- user's address, if given
- user's email address, if given
- possible information about the location that the feedback concerns (map coordinates, address)
- files attached by the user
- technical information such as the device type, operating system and browser version used to submit the feedback in order to correct malfunctions
- consent to publish the feedback, if given.

#### Additionally,

- Company/organisation information, if given by the user
  - Name
  - Name of contact person
  - Business ID
  - Address
  - Email address
  - Phone number

## **Data retention period**

Data is stored in the database of the data system for a period deemed necessary in terms of operations and reporting, or until the feedback submitter requests that it is deleted. If it is required to store data to fulfil legal obligations (for comments, among other things), the data retention period is 5 years, unless otherwise specified by law.

#### **Compliant data sources**

Only such data that the users themselves wish to provide is saved in the system. You can contact us:

- via the browser in the Finnish Transport Infrastructure Agency's web services, for example Palauteväylä.fi
- by phoning the customer service +358 295 020 600 or by writing a message in the chat channel at Palauteväylä.fi
- by sending an email to the address liikenteen.asiakaspalvelu@ely-keskus.fi.

Members of customer service staff may register feedback submitted by phone or at the customer service desk in the system on behalf of the customer, for example by phoning:

- the Road Users' Phone Service. Calls made to the Road Users' Phone Service are registered in the Finnish Transport Infrastructure Agency's Road Traffic Management Centre, from where the data is transmitted to the feedback system.
- a specialist at the Finnish Transport Infrastructure Agency, who will register the issue in the feedback system.

### **Compliant transfers of data**

Data is not transferred outside the European Union or the European Economic Area. The public data contents in the feedback system (published feedback and feedback responses without personal data) will be published via the REST interface.

Data is only transferred in certain cases and to parties as specifically defined by the applicable law.

#### **Principles for protection of the register**

Access to electronically saved register data requires a personal user ID and password or strong identification. The rights to process personal data is granted to such persons at the Finnish Transport Infrastructure Agency, ELY Centre or system provider, who are required to process personal data as part of their work tasks. Persons who have access to personal data have undergone training in the use of the personal register and the handling of personal data.

The protection of technical equipment is provided according to the Finnish Transport Infrastructure Agency's data protection instructions.

## **Rights of registered users**

Everyone has the right to check their own data saved in the register, request data to be corrected or deleted, request limited handling, or object to the data handling.

The right to have one's data deleted is not without exception. The Finnish Transport Infrastructure Agency may refuse to delete feedback submitted by a user if the feedback must be processed in order to fulfil a legal obligation, enable disruption information, or for a similar justification. In these cases, only the contact information will be deleted, whereby the submitter of feedback can no longer be linked to the contents of the feedback.

The request shall be submitted to the address: Finnish Transport Infrastructure Agency Registrar's Office PO Box 33 FIN- 00521 Helsinki or to the email address kirjaamo@ftia.fi.

The data and measures are free of charge for registered persons, unless the requests are obviously unjustified or unreasonable, and especially if they are repeated.

Other rights relating to the handling of personal data