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# Väylävirasto Trafikledsverket

## Privacy policy: Stakeholder activities

This privacy policy describes the purposes for which your personal data is used and the rights you have as a data subject. This privacy policy applies to the Finnish Transport Infrastructure Agency's stakeholder activities, including the stakeholder register, communications, surveys and events. Entrants to events can be added to the stakeholder register.

### Contents

1	Data controller and data protection officer .....	1
2	Purpose of personal data processing.....	1
3	Basis for the processing of personal data .....	2
4	The personal data to be processed .....	2
5	Retention period of personal data.....	3
6	Regular sources of data .....	3
7	Recipients of personal data .....	3
8	Data transfers outside the EU or EEA.....	4
9	Rights of the data subject .....	4

### 1 Data controller and data protection officer

<b>Finnish Transport Infrastructure Agency</b> P.O. Box 33 FI-00521 Helsinki, Finland  kirjaamo@vayla.fi Tel. +358 295 34 3000	Contact persons: Krista Ruiz kirjaamo@vayla.fi	Data protection officer: Tomi Lapinlampi kirjaamo@vayla.fi
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### 2 Purpose of personal data processing

The purpose of the processing of personal data is customer service, stakeholder meetings, formation of invitation lists, sending of invitations, customer surveys and newsletters, and other communications related to stakeholders.

28.5.2020

In the case of event registrations, the purpose of the processing of personal data is to organise the event in question, to provide information to the entrants and to process feedback received regarding the event.

### **3 Basis for the processing of personal data**

The processing of personal data is based on Article 6(1)(e) of the General Data Protection Regulation, i.e. processing is necessary for the performance of a task carried out in the public interest as follows:

As far as stakeholders are concerned, this is a processing of personal data in accordance with Section 4(1)(1) of the Data Protection Act (1050/2018), as it is a matter of data describing the position of a person, his/her duties or the performance of these duties in a public sector entity, business and industry, activities of civil society organisations, or other corresponding activities. The aim of the processing is of public interest, as the Transport Infrastructure Agency both wants to gather the views of stakeholders and inform them about its statutory task of transport infrastructure management and resulting activities. Article 1(2) of the Act on the Finnish Transport Agency (862/2009) states that the Transport Infrastructure Agency operates in a customer-oriented and expertise-driven manner, and that its operations are proactive as well as knowledge- and risk-based.

In the case of events, this is a processing of personal data in accordance with Section 4(1)(2) of the Data Protection Act (1050/2018), as processing is proportionate and necessary for the performance of a task carried out in the public interest by an authority. With the help of the events, the Transport Infrastructure Agency both wants to gather the views of clients and inform them about its statutory task of transport infrastructure management and resulting activities. Article 1(2) of the Act on the Finnish Transport Agency (862/2009) states that the Transport Infrastructure Agency operates in a customer-oriented and expertise-driven manner, and that its operations are proactive as well as knowledge- and risk-based. In addition, the Transport Infrastructure Agency must ensure the safety of its events and facilities.

The basis for the processing of data on special dietary requirements shall be the explicit consent of the data subject to the processing of those personal data in accordance with Article 9(2)(a) of the General Data Protection Regulation.

### **4 The personal data to be processed**

The person's name, contact information such as phone number and email address, position in the organisation, the organisation, its sector and contact information respective to the organisation, such as the address; and the feedback and other messages provided by the person for the Transport Infrastructure Agency, including documentation. There is no legal or contractual obligation for the provision of personal data for the

28.5.2020

stakeholder register. If no personal data is provided, the person will not receive communications and invitations intended for stakeholders.

With regard to events, the data includes information on the event and the provided special dietary requirements, in addition to the above. The provision of the necessary personal data upon registering for an event is a prerequisite for participating in the event.

## **5 Retention period of personal data**

Personal data will be retained until the personal data are no longer needed in the stakeholder register, for example, due to a change of the organisation's representative, or when a person has requested that the data be deleted.

Information about special dietary requirements is deleted after the event's after-processing has been completed. Other information may be stored or updated in the Transport Infrastructure Agency's stakeholder register.

## **6 Regular sources of data**

Personal data are obtained either from the person themselves, from the organisation represented by the person, or from publicly available sources, such as an organisation's website.

In principle, personal data are obtained from the data subject when s/he registers for the event, but, by way of exception, another person from the organisation may have made the registration on his/her behalf.

## **7 Recipients of personal data**

The information will be disclosed to the requesting person in accordance with the Act on the Openness of Government Activities. Information and documents shall be public, unless explicitly determined as confidential by law.

Personal data on a person's state of health, such as special dietary requirements, are considered confidential.

In order to fulfil its legal obligations, the Transport Infrastructure Agency uses its contractual partners as data processors. Personal data are processed in the information systems of the Transport Infrastructure Agency or its contractual partners, whose suppliers also act as data processors or sub-processors. The Transport Infrastructure Agency's contractual partner with regard to events is HRG Finland and, with regard to the stakeholder register, Valtori with Sofigate as its subcontractors.

The data will not be disclosed for direct marketing and opinion or market research, unless such disclosure is expressly provided for.

28.5.2020

## **8 Data transfers outside the EU or EEA**

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

## **9 Rights of the data subject**

You have the right to know whether we process personal data about you and the right to receive a copy of your personal data.

You may request us to correct your data if incorrect.

You can request the erasure of your personal data. For an upcoming event, this means deleting the registration.

You may object to the processing of your personal data on the basis of your particular situation when the Transport Infrastructure Agency processes your data for the purpose of performing a task of public interest or for exercising the public authority of the Transport Infrastructure Agency.

If the processing is based on consent, you may withdraw your consent at any time by notifying us.

You may ask us to restrict the processing of your personal data in the following situations:

- information about you is incorrect
- you have objected to the processing of your personal data, but your request has not yet been processed
- you need information to establish, exercise or defend a legal claim
- your data are being processed in violation of the law, but you do not want your data to be erased

No decisions are made regarding stakeholders and events based on automated processing of data subjects, 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 Data Protection Ombudsman (Office of the Data Protection Ombudsman, [www.tietosuoja.fi](http://www.tietosuoja.fi)) acts as the supervisory authority.