



14 March 2023

Privacy statement, source code version management

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 Finnish Transport Infrastructure Agency's version management system for source code (GitHub).

Contents

1	Data controller and data protection officer	2
2	Purpose of personal data processing	2
3	Basis for the processing of personal data	3
4	The personal data to be processed	3
5	Storage period of personal data	4
6	Regular sources of data	4
7	Personal data recipients	4
8	Transfers of data outside the EU or EEA	5
9	Rights of data subjects	5

14 March 2023

1 Data controller and data protection officer

Controller	Contact	Data protection officer
Finnish Transport Infrastructure Agency P.O. Box 33 FI-00521 Helsinki kirjaamo@vayla.fi Tel. +358 295 34 3000	Minna Huovinen	Tomi Lapinlampi kirjaamo@vayla.fi

2 Purpose of personal data processing

The purpose of the processing of personal data is to carry out version management for the application codes of the Finnish Transport Infrastructure Agency.

The purpose of version management is to keep track of the changes made to the application and the versions of these changes. The changes are saved in a version management system where the different versions are available. Version management describes the history and authors of changes made to the application. Version management can be used to always return to an earlier version of a file, allowing for the reversal of developments in an undesirable direction and the

14 March 2023

tracing of errors, for example. Application version management systems are a central part of agile application development.

3 Basis for the processing of personal data

In accordance with Article 6(1)(c) of the General Data Protection Regulation, the processing of personal data is based on the processing being necessary for compliance with a legal obligation of FTIA. This is based on the Act on Information Management in Public Administration:

- section 13 on the information security of datasets and information systems, according to which an information management entity shall monitor the state of the data security of its operating environment and ensure the data security of its datasets and information systems over their entire lifecycle.
- section 15 on ensuring dataset safety; and
- section 16 on the management of access rights to information systems.

4 The personal data to be processed

The Finnish Transport Infrastructure Agency processes the following personal data:

Application developers' GitHub usernames

14 March 2023

Application developers' FTIA usernames

Data related to each username in version management

5 Storage period of personal data

Personal data is stored throughout the life cycle of the version management system and for 4 years after it has been shut down.

6 Regular sources of data

Personal data is obtained from the data subject in connection with changes made to the application code.

7 Personal data recipients

Personal data is disclosed to the authorities requesting it in accordance with the Act on the Openness of Government Activities. Official documents are public unless specifically covered by a confidentiality obligation by law.

The Finnish Transport Infrastructure Agency uses its contractual partners as processors of personal data. Personal data is processed in the information systems of the Transport Infrastructure Agency or its contractual partners, whose suppliers also act as data processors or sub-processors.

14 March 2023

Personal data is not disclosed for direct marketing or for opinion or market research purposes.

8 Transfers of data outside the EU or EEA

Personal data is transferred outside the European Union or the European Economic Area. The transfer is made using standard contractual clauses for data protection issued by the Commission in accordance with Article 46(2)(c) of the GDPR.

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

14 March 2023

- 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](#)).