

# Key management of Spatial data services

#### 1 Controller

The controller is the Finnish Transport and Communications Agency (Traficom).

#### 1.1 Controller's contact details

PO Box 320, FI-00059 TRAFICOM, Finland kirjaamo@traficom.fi telephone +358 29 534 5000

#### 1.2 Contact details of the controller's data protection officer

PO Box 320, FI-00059 TRAFICOM, Finland tietosuoja@traficom.fi telephone +358 29 534 5000

If your message contains confidential, non-disclosable or otherwise sensitive content or a personal identity code, please use Traficom's <u>secure</u> email.

#### 1.3 Service description

The purpose of the key management of spatial data services is to enable Traficom to monitor the use of specific map interfaces separately for each user and to allow users to register as users of the service. The system processes the users' contact information.

#### 1.4 Grounds for and purpose of data processing

When Traficom uses the service to carry out its statutory duties, personal data is processed in the service to comply with a legal obligation. The data may also be processed when it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Traficom.

Act on Electronic Communications Services, section 136, Confidentiality of communications (see also section 138 that refers to section 272). In addition, section 272 as regards when messages and traffic data can be processed for information security purposes.



According to section 17 of the Act on Information Management in Public Administration (906/2019), an authority shall ensure that the necessary log data is compiled of the use of its information systems and the disclosure of information therefrom if the use of the information system requires identification or other login.

#### 2 Data content

#### 2.1 The data undergoing processing

The data recorded in the system includes company contact information (e.g. email) and references to the HENKI system as regards users that have performed operations in the system's key management event log.

#### 2.1.1 Technical data related to use

The system contains technical data, such as data on errors and connections, that is collected to improve the functioning and usability of the application and to solve technical issues.

#### 2.2 Sources of the processed data (where data is received from)

Data is received from users representing an organisation when they are logged in to the system and enter their organisation's details and perform actions as representatives of the organisation in question.

#### 2.3 Storage period of personal data

The storage period of data included in the system will be determined later and will be managed by internal users at Traficom.

#### 3 Data processing

# 3.1 Recipients and categories of recipients of personal data (to whom personal data is disclosed)

The right to view and edit the personal data included in the register is granted to strictly limited user groups within Traficom. The representative of an organisation is also able to view the details of his or her own organisation via the user interface.

Data is not disclosed outside Traficom.



#### 3.2 Processing of personal data on behalf of the controller

Access to data in the system is restricted to strictly limited user groups within Traficom.

External users can only manage their own email addresses and the retrieved keys but cannot process data on other sectors.

Traficom is the controller with regard to the data in the system.

# 3.3 Transfer of personal data to third countries outside the EU/EEA

The data is processed in the EU/EEA.

#### 3.4 Automated decision-making and profiling

Automatic decision-making or profiling is not used.

# 4 Rights related to the processing of personal data

#### 4.1 About exercising rights

You can exercise your rights by submitting a request to Traficom by email or post. The controller's contact details are listed in this privacy statement under the section 'Controller's contact details'.

#### 4.2 The right to lodge a complaint with the supervisory authority

If you believe that your personal data is being processed in violation of legislation, you may lodge a complaint with the Office of the Data Protection Ombudsman.

Office of the Data Protection Ombudsman PO Box 800, FI-00531 Helsinki, Finland tietosuoja@om.fi
Tel. +358 29 566 6700

# 4.3 Right of access

The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed. If processing takes place, the data subject has the right to access the personal data.

A data subject can submit his or her request to the Registry by email or by post.



#### 4.4 Right to rectification

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

Information on the right of the data subject is provided on Traficom's website (<a href="https://www.traficom.fi/en/traficom/privacy-policy">https://www.traficom.fi/en/traficom/privacy-policy</a>). A data subject can submit his or her request to the Registry by email or by post.

# 4.5 Right to object

Information on the right of the data subject is provided on Traficom's website (<a href="https://www.traficom.fi/en/traficom/privacy-policy">https://www.traficom.fi/en/traficom/privacy-policy</a>).

The data subject may object to the processing of his or her personal data if processing is based on the public interest, legitimate interests or the exercise of official authority. In that case, the controller may continue processing the data only if it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. However, the right to object does not usually apply to processing based on a legal obligation.

A data subject can submit his or her request to the Registry by email or by post.

#### 4.6 Right to restriction of processing

The data subject has the right to obtain from the controller restriction of processing if:

- the data subject contests the accuracy of the personal data
- the processing is unlawful, but the data subject opposes the erasure of the personal data and requests the restriction of its use instead
- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims
- the data subject has objected to the processing of the personal data pending the verification of whether the legitimate grounds of the controller override those of the data subject.

Information on the right of the data subject is provided on Traficom's website (https://www.traficom.fi/en/traficom/privacy-policy).



A data subject can submit his or her request to the Registry by email or by post.

# 4.7 Right to data portability

The right does not apply to the processing operations in question because the personal data is processed on the basis of a legal obligation and the public interest / the exercise of official authority.

# 4.8 Right to erasure

This right does not apply to the processing operations in question because personal data is not processed on the basis of consent or agreement.