

## Recording camera surveillance of the service provider's theory test facilities

<p><b>Controller</b> Finnish Transport and Communications Agency (Traficom)</p>	<p><b>Controller's contact details</b> PO Box 320, FI-00059 TRAFICOM, Finland kirjaamo@traficom.fi Tel. +358 29 534 5000</p> <p><b>Contact details of the controller's data protection officer</b> PO Box 320, FI-00059 TRAFICOM, Finland tietosuoja@traficom.fi Tel. +358 29 534 5000</p> <p>If your message contains confidential, secret or otherwise sensitive content or a personal identity code, please use Traficom's <a href="#">secure email</a>.</p>
<p><b>Grounds for and purpose of the data processing</b></p> <p>The processing of personal information is based on the GDPR (EU) 2016/679 Article 6(1)(e) and the Data Protection Act Section 4(1)(2) specifying it, according to which the processing of personal information is in accordance with the law when it is necessary and proportionate for the performance of a task carried out in the public interest by the public authority. Personal data is processed to perform the statutory duties of a public authority.</p> <p>Recording camera surveillance in theory test rooms is used to investigate and prevent cases of cheating. Recording camera surveillance is carried out to prevent, investigate and prove crimes, offences and other misconduct. Camera surveillance is also carried out to ensure the safety of employees and other persons and to prevent and investigate situations that endanger safety. The recordings may be used, if necessary, to assert, establish or defend legal claims or to ensure other legal protection.</p>	

<b>Data content</b>	
The data undergoing processing	The camera surveillance register stores information about people who are taking a theory test for a driving examination. The data content consists of events recorded by the camera, which, in addition to the recorded image, include information about the time of the recording (time and date). The camera system does not record sound.
Sources of the processed data (where data is received from)	Ajovarma carries out the camera surveillance as Traficom's service provider. If necessary, camera recordings will be provided to Traficom in case of suspected cheating. Camera surveillance is only performed in separate theory test rooms while the candidate is participating in a theory test. Customers are informed of recording camera surveillance with signs at Ajovarma service points.
Storage period of personal data	The records of the camera surveillance shall be retained for a period of 30 days. The length of the storage period is intended to ensure that any deviations recorded by the camera surveillance system can be detected and investigated. The camera surveillance system deletes the recordings automatically when the storage period ends.

	The recordings are used in Traficom to investigate cheating cases. The recordings can also be delivered to a criminal investigation authority, in which case they are kept for the period of the detection process, preliminary investigation and the possible court hearing. The length of the legal process also includes appeal periods.
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<b>Data processing</b>	
Recipients and categories of recipients of personal data (to whom personal data is disclosed)	In cases of suspected crime, data may be disclosed to the preliminary investigation authority if necessary in accordance with Finnish legislation.
Processing of personal data on behalf of the controller	Ajovarma Oy, Business identification code 1033613-0
Transfer of personal data to third countries outside the EU/EEA	Personal data is not transferred outside the EU/EEA.
Automated decision-making and profiling	The processing of personal data does not involve automated decision-making or profiling.

<b>Rights related to the processing of personal data</b>	
<p><b>About exercising rights</b></p> <p>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'.</p> <p><b>The right to lodge a complaint with the supervisory authority</b></p> <p>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.</p> <p style="text-align: center;">Office of the Data Protection Ombudsman PO Box 800, FI-00531 Helsinki tietosuoja(at)om.fi tel. +358 29 566 6700</p>	
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. Camera recordings are not handed over directly to individuals themselves (camera recordings are confidential because they include information about the test questions, Act on the Openness of Government Activities (621/1999) Section 24(1)(22))
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.

<p>Right to object</p>	<p>In situations where the processing of personal data is based on public interest, the exercise of official authority vested in the controller or the legitimate interest of the controller or a third party, the data subject has the right to object to the processing of personal data concerning him or her.</p> <p>If a data subject uses his or her right to object, the controller must stop the processing of the personal data, unless the controller demonstrates 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.</p> <p>If personal data is processed for direct marketing purposes, the data subject has the right to object to the processing without any specific grounds.</p> <p>In situations where personal data is processed for statistical or research purposes, the data subject may object to the processing on grounds relating to his or her particular situation, in response to which the controller must stop processing the data subject's data, unless the processing is necessary for performing a task carried out for reasons of public interest.</p>
<p>Right to restriction of processing</p>	<p>The data subject has the right to obtain from the controller restriction of processing if:</p> <ul style="list-style-type: none"> <li>- the accuracy of the personal data is contested by the data subject;</li> <li>- the processing is unlawful but the data subject opposes the erasure of the personal data and requests the restriction of their use instead;</li> <li>- 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;</li> <li>- 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.</li> </ul>
<p>Right to data portability</p>	<p>This right does not apply to the processing operations in question because personal data is not processed on the basis of consent or agreement.</p>
<p>Right to erasure</p>	<p>In situations where the legal basis for the processing of personal data is something other than compliance with a legal obligation, the data subject has the right to obtain from the controller the erasure of personal data concerning him or her. The requested data will be erased unless the controller has a legal basis for refusing to erase the data, such as a legal obligation to retain the data.</p>
<p>Right to lodge a complaint with a supervisory authority</p>	<p>The data subject has the right to bring the matter to the data protection officer if the data subject considers that the processing of their personal data infringes applicable legislation. This right is without prejudice to any other administrative or judicial remedy.</p>