



3 November 2021

Privacy statement: Traffic Customer Service

The purposes for which your personal data is used and your rights as a data subject are described in this privacy statement. This privacy policy applies to the Traffic Customer Service, which is a nationwide customer service for road, rail and waterway matters jointly managed by the Finnish Transport Infrastructure Agency (hereafter also the 'FTIA') and the Centres for Economic Development, Transport and the Environment (hereafter also 'ELY Centres'). In the Traffic Customer Service, you can request advice, give feedback and submit development proposals and notifications concerning Finland's state-owned transport infrastructure.

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1 Data Controller and Data Protection Officer

| Controller | Contact person | Data protection officer |
|--|---|---|
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2 Purpose of personal data processing

The personal data is processed to perform official duties, which include the provision of advice for the customers of the FTIA and the ELY Centres' transport area of responsibility and the management of customer contacts.

The purpose is to provide advice and receive feedback, development proposals and notifications concerning roads, railways and waterways.

Customers are not required to give their personal details and you can send messages anonymously or using a pseudonym. The contact information provided by the customers allows the FTIA and the ELY Centres to answer customers' queries and to communicate with them. The customers' email addresses and other contact information are only used to answer the queries. The FTIA and ELY Centres may also send alerts to a customer's email address so that the customer can check the status of the query. The accuracy of the personal data sent by the customer is not verified.

Customer contacts, answers to the queries sent by the customers and any contact details and attachments are entered in the Traffic Customer Service information system. Access to feedback containing sensitive information is restricted and matters belonging to other processes and systems are transferred to them for processing.

Notifications concerning the state of specific roads and any customer contact details are forwarded to the FTIA's regional contractors (FTIA's Harja system) who decide on the required measures on the basis of the quality requirements set for the road concerned. Under the agreements between the FTIA/ELY Centres and regional contractors, a contractor may directly contact the customer sending the feedback if the customer has given their contact details.

When electronic feedback channels are used, the customer providing the feedback may be asked for a permission to publish the message, and the feedback and the answer to it can only be published after the customer has given their consent. After the customer has given their consent to the publication, the Finnish Transport Infrastructure Agency may freely use, edit, disclose and publish the content of the feedback.

Feedback defined as public in the feedback system and published in online services, along with answers to such feedback, can be read via the REST interface (Open311 interface) and can also be published in other online services. Feedback published in the interface does not contain any personal data. Online services sending feedback to the system via the interface are approved by the system administrator using a separate identification key.

3 Grounds for personal data processing

Processing of personal data is based on the performance of a task carried out in the public interest as laid down in Article 6(1)(e) of the General Data Protection Regulation (679/2016). The Finnish Transport Infrastructure Agency is responsible for the maintenance of Finland's roads and for their service level, for major road projects, nationwide road maintenance tasks, as well as for the planning, construction and maintenance of Finland's railways and waterways and their service level. The FTIA operates in a customer-oriented manner with expertise at the core of its work. The agency takes a proactive, information-centred and risk-based approach to its operations.

The public-interest task of the FTIA is laid down in the following legislation:

- Act on the Finnish Transport Infrastructure Agency (936/2018)
- Part III of the Act on Transport Services (320/2017)
- Act on Highways and the Transport System (503/2005)
- Railways Act (110/2007)
- Vessel Traffic Service Act (623/2005)

The Finnish Transport Infrastructure Agency also processes personal data to ensure that its operations are in compliance with the following legislation generally applicable to official activities:

- Section 8 of the Administrative Procedure Act (434/2003)
- Act on the Provision of Digital Services (306/2019), in particular section 5 of the act

4 What personal data is processed?

FTIA may process the following personal data:

- The name or pseudonym given by the user
- The phone number given by the user
- The address given by the user
- The email address given by the user
- The vehicle registration number given by the user
- Location data concerning the feedback or the user's location (map coordinates or address)
- Attachments supplied by the user
- Technical information, such as the type of equipment, operating system, IP address and browser version used by the feedback provider (for troubleshooting).
- Other content of the message (such as feedback) sent by the user
- Permission to publish the message (such as feedback or a question)

In addition

- Details of a company/association given by the user, such as
 - Name of the organisation
 - Name of the contact person
 - Business ID

- Address
- Email address
- Phone number

5 Retention time of personal data

The personal data is kept in the information system database as long as it is needed for operational and reporting purposes or until the feedback provider requests the removal of the data.

If the FTIA has to retain the data to meet its legal obligations, the data is stored for either five years or the period specified by law.

6 Regular sources of information

Most of the data is obtained from the data subjects themselves. There is no legal or contractual obligation to provide personal data and it is not a prerequisite for concluding an agreement. The data subject is not obliged to provide personal data but the FTIA needs contact details and other information to contact the data subject.

The feedback provider may occasionally include personal data of other individuals (such as a registration numbers of vehicles located in a road area) in its feedback.

Only the data that the user provides when contacting the FTIA is entered in the system. You can contact the FTIA:

- using the browser [on the Traffic Customer Service website](#) at
- using the Traffic Situation mobile application
- by phoning Traffic Customer Service or by sending a message on the chat channel
- by sending an email to Traffic Customer Service

Customer service staff can enter feedback sent by phone or given at the customer service desk in the system on the customer's behalf:

- by phoning road users' hotline at 0200 2100. The calls made to the road users' hotline are recorded at the road traffic centre of Fintraffic Road Ltd from where they are transferred to the feedback system.
- by phoning an FTIA expert who enters the matter in the feedback system.
- by contacting the registry of an ELY Centre or the FTIA, if the matter falls within the purview of the Traffic Customer Service

7 Recipients of personal data

Personal data is disclosed to parties who request it in accordance with the Act on the Openness of Government Activities. The data and the documents are public, unless explicitly defined as secret in the law.

The Finnish Transport Infrastructure Agency provides a national advisory service for road, rail and waterway matters in cooperation with the Centre for Economic Development, Transport and the Environment for Pirkanmaa. The personal data is processed by regional road management contractors that are in a contractual relationship with the FTIA or an ELY Centre, track managers, and Fintraffic Ltd and its subsidiaries: Fintraffic Railway Ltd, Fintraffic Road Ltd, Fintraffic Vessel Traffic Services Ltd and Fintraffic Air Navigation Services Ltd.

FTIA uses its contracting partners as processors of personal data. Personal data is processed in the information systems of FTIA or its contracting partners, and the suppliers of these information systems also act as the processors or sub-processors of the personal data.

No information is disclosed for direct marketing or for opinion and market research, unless there are separate provisions permitting disclosure for this purpose.

Feedback and questions and answers to them that do not contain personal data are published with the data subject's consent.

8 Data transfers outside the EU or EEA

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

9 Data subject rights

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 when:

- you have informed FTIA of incorrect personal data and FTIA is investigating the matter;
- 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; or
- you have objected to processing pursuant to Article 21(1) pending the verification of whether the legitimate grounds of FTIA override your own.

You have the right to object to the processing of your personal data on the basis of a special personal situation when FTIA is processing your personal data on the basis of Article 6(1)(e) of the General Data Protection Regulation to perform a task promoting the public interest or to exercise public authority belonging to FTIA.

FTIA does not make decisions based on automated decision-making methods such as profiling.

You can submit a request relating to your rights as a data subject to FTIA by e-mail or by post. For contact information, see section 1.

The data is provided and measures carried out free of charge to the data subject unless the requests are manifestly unfounded or unreasonable, and particularly if they are repeatedly presented.

You have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data concerning you violates the applicable data protection regulations. In Finland, the supervisory authority is the Data Protection Ombudsman ([Office of the Data Protection Ombudsman](#)).