Reg. no Traficom/568370/00.04.00.03/2024



Traficom.fi online service user test

Controller

Finnish Transport and Communications Agency (Traficom)

Controller's contact details

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

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, secret or otherwise sensitive content or a personal identity code, please use Traficom's <u>secure</u> email.

Grounds for and purpose of the data processing

In October and November 2024, Traficom carries out customer interviews for .fi domain name and radio licence customers. The purpose of the interviews is to examine customer needs and to develop the services mentioned above.

Personal data is processed for the purpose of making arrangements regarding the participation in customer interviews. The data is collected with a Webropol-based questionnaire. The person answering the questionnaire shall provide their name and email address. The contact information is collected so that the user can be contacted to agree on a test time.

Traficom processes personal data provided by the respondents insofar as the person has filled in the data on the questionnaire. The basis for the personal data processing is the controller's performance of its statutory duties and tasks carried out in the public interest. Traficom has a duty to produce and share information. As such, the grounds for the processing are public interest based on the controller's obligation to provide information about current events in the transport and communications sectors, which are part of its field of competence. Furthermore, provisions on Traficom's duties and special tasks are laid down in the Act on Electronic Communications Services. (Articles 6(1)(c) and 6(1)(e) of the EU General Data Protection Regulation.)

Those who participate in the customer interviews will receive a reward for participating, which is why necessary personal data is also collected from the participants in order to report the reward to the Tax Administration's Incomes Register. Receiving the reward and providing personal data in that way is voluntary for the participant.

Data content



The data undergoing processing	We process personal data of persons who register for the user tests. The persons are recruited for the user tests through the Webropol form. Webropol uses necessary cookies for the functioning of its service platform and collects the data specified below using them. These cookies are related to monitoring the functionality and quality of the service. Webropol uses cookies to collect e.g. the following information: - operating system - browser version - IP address - browser add-ons - number of times the survey has been opened in the space of one week - page download time - incomplete responses. In addition, the personal data file includes information provided by the user during the tests that is needed to report the rewards to the Incomes Register.
	During the study we interview and observe customers regarding the use of Traficom's .fi domain name service and radio licence services. The notes from the interviews and observations form the research material that is part of the dataset. The notes and the personal data file are not connected to each other and the customers' answers are not linked to individuals.
Sources of the processed data (where data is received from)	Personal data is collected from the interviewees themselves in connection with registering for the interviews, through the Webropol form and in connection with the tests for receiving the rewards and for reporting the information to the Incomes Register.
Storage period of personal data	The interviews are conducted in October 2024. The personal data file is collected for recruiting and rewarding interviewees and it is only stored for as long as the processing is necessary. After this, the information will be deleted from the dataset.
	Webropol will store data collected through cookies for 14 days.

Data processing

Recipients and categories of recipients of personal data (to whom personal data is disclosed) The personal data is used by Traficom's customer experience team (Traficom + external consultants) for the duration of the customer study. The customer experience team includes employees from Traficom, Gofore Oy, CGI Suomi Oy and Vincit Oy. In addition, the reports to the Incomes Register are handled by an HR employee at CGI.

Personal data is stored on the Webropol Oy (business ID 1773960-2) service platform. Webropol Oy and Traficom have an agreement on processing personal data.

The personal data is used by Traficom for the duration of its processing. As a rule, personal data is not disclosed to third parties.



Processing of personal data on behalf of the controller	In this study, on behalf of Traficom, personal data is processed by: Gofore Oyj, business ID 1710128-9 CGI Suomi Oy, business ID 0357502-9 Webropol Oy (business ID 1773960-2) is the processor and Telia Cygate (business ID 0752421-0) and Qumio Oy (business ID 2466203-3) process the data as Webropol's subcontractors. Webropol may not transfer personal data to third parties, except to specific subcontractors agreed upon by Webropol and Traficom. The following subcontractors may act as processors in accordance with the definition in the data protection regulation when serving as Webropol subcontractors to ensure and improve the development, usability and reliability of the system:
	Telia Cygate (business ID 0752421-0) Qumio Oy (business ID 2466203-3).
Transfer of personal data to third countries outside the EU/EEA	The data will not be transferred outside the EU/EEA.
Automated decision- making and profiling	The processing of personal data does not involve automated decision-making or profiling.

Rights related to the processing of personal data

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'.

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(at)om.fi tel. +358 29 534 6700

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



	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. If personal data is processed for direct marketing purposes, the data subject has the right to object to the processing without any specific grounds.
	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.
Right to restriction of processing	The data subject has the right to obtain from the controller restriction of processing if: - the accuracy of the personal data is contested by the data subject; - the processing is unlawful but the data subject opposes the erasure of the personal data and requests the restriction of their 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.
Right to data porta- bility	The data subject has the right to receive the personal data concerning him or her, which he or she has provided to the controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or on a contract and the processing is carried out by automated means.
Right to erasure	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.
Right to withdraw consent	Insofar as personal data is processed on the basis of the consent of the data subject, the data subject may withdraw his or her consent at any time by notifying the controller of the withdrawal. Withdrawing consent will not affect the lawfulness of processing carried out on the basis of the consent of the data subject before its withdrawal.