

BACKGROUND CHECK REGISTER

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 secure email .
Grounds for and purpose of the data processing <p>Traficom processes the data stored in the register on the basis of Article 6(1)(c) of the General Data Protection Regulation (EU) 2016/679 in order to comply with a legal obligation. Special categories of personal data and personal data relating to criminal convictions and offences are processed by Traficom on the basis of section 6, subsection 1, paragraph 2 of the Data Protection Act (1050/2018), meaning that the processing is provided by law or derives directly from a statutory duty set out for Traficom by law.</p> <p>Section 101 of the Aviation Act (864/2014) lays down provisions on background checks in aviation.</p> <p>In order to check a person's background, a security clearance vetting is requested. According to the Act, the airport operator applies for security clearance vetting on persons referred to in section 19, subsection 1, paragraph 7 and section 21, subsection 1, paragraph 4a of the Security Clearance Act (726/2014). Regardless of secrecy regulations, the airport operator must provide Traficom with any such information discovered in a personnel security clearance vetting or integrity monitoring carried out in accordance with section 51 of the Security Clearance Act that is necessary for assessing the granting of a permit or approval that requires compliance with the requirements related to background checks.</p> <p>According to section 3 of the Aviation Act, Traficom acts as Finland's competent national aviation authority and is responsible for issuing permits and approvals for tasks that require compliance with the requirements related to background checks. However, the airport operator is responsible for granting access permits referred to in section 102 and airport identification cards referred to in section 103 of the Aviation Act.</p> <p>Under section 181 of the Aviation Act, Traficom may process data that is necessary for granting access permits or airport identification cards when a revision of a decision made by the airport operator is claimed from Traficom.</p>	

Data content	
The data undergoing processing	<p>The background check register contains data on:</p> <ol style="list-style-type: none"> 1) persons who work in tasks related to aviation security checks, access control or other security control measures outside a security restricted area in an airport or who work in tasks where they can independently access air cargo, air mail, air carrier mail and air carrier materials or in-flight supplies or airport supplies after they have been subject to security control measures 2) persons who are responsible for aviation security checks, access control or other security control measures or implement them in a security restricted area in an airport or otherwise have independent access to security restricted areas in the airport in their tasks 3) regulated agents, known consignors and regulated suppliers. <p>Data that may be recorded of natural persons:</p> <ol style="list-style-type: none"> 1) first names and last name 2) date of birth or personal identity code 3) nationality 4) contact information 5) employer and work task 6) information contained in a written notice issued of a personnel security clearance vetting or integrity monitoring related to <ul style="list-style-type: none"> - criminal records - the register of fines - credit records and the enforcement register - a criminal matter pending pre-trial investigation, consideration of charges or court proceedings - a security clearance vetting interview - information provided by the National Bureau of Investigation related to the prevention or disclosure of crime - information that the subject of the vetting has resided abroad for an uninterrupted period of more than five years during the ten years preceding the security clearance. <p>Data that may be recorded of legal persons:</p> <ol style="list-style-type: none"> 1) name, auxiliary business name and Business ID 2) domicile 3) contact information 4) information on the security manager.
Sources of the processed data (where data is received from)	In order to carry out its duties, Traficom receives data from Finavia (Business ID: 2302570-2). Furthermore, Traficom may request data from the data subjects themselves and their employers, if necessary.
Storage period of personal data	The information in the register is stored permanently with the exception of written notices regarding the security clearance vetting

	and integrity monitoring concerning a natural person. These documents are kept for five years after the calendar year when the final decision was given.
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Data processing	
Recipients and categories of recipients of personal data (to whom personal data is disclosed)	<p>Regular disclosures</p> <p>Traficom may disclose data to the subject of a background check, the applying company and Finavia within the limits of the law.</p> <p>Data may also be disclosed to other parties within the limits of the law.</p>
Transfer of personal data to third countries outside the EU/EEA	Traficom does not transfer personal data outside the EU/EEA.
Automated decision-making and profiling	Traficom does not use automated decision-making or profiling.

Rights related to the processing of personal data	
<p>About exercising rights</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>The right to lodge a complaint with the supervisory authority</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, Finland 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.
Right to rectification	The data subject has the right to obtain the controller without undue delay the rectification of inaccurate or incorrect personal data.
Right to restriction of processing	The data subject has the right to obtain from the controller restriction of processing if: <ul style="list-style-type: none"> - the data subject contests the accuracy of the personal data

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	<ul style="list-style-type: none">- 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.
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