

Reg. no. TRAFCOM/702279/00.04.00.03/2024 17.12.2024

# Air Transport market mapping study

Controller	Controller's contact details
Finnish Transport and Communications Agency (Traficom)	PO Box 320, FI-00059 TRAFICOM, Finland kirjaamo@traficom.fi Tel. +358 29 534 5000
	Contact details of the controller's data protection officer
	PO Box 320, FI-00059 TRAFICOM, Finland tietosuoja@traficom.fi Tel. +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

The processing of personal data is based on the performance of a task related to the general interest of the data controller (General Data Protection Regulation (2016/679) Article 6, Paragraph 1 Subsection e and Data Protection Act (1050/2018) § 4).

With the help of an Air Transport market mapping survey, Traficom is looking for possible way, using the views and opinions of the respondents, to make the operation of the Helsinki-Savonlinna route most efficient and customer-friendly.

Data content	
The data undergoing processing	The survey is conducted anonymously. The survey does not ask for information about the identity of the respondents, and the data subject is asked not to provide any identifying personal information. When answering a survey, the respondent's IP address is forwarded, but Traficom is basically unable to connect IP addresses to individual answers.  Webropol uses cookies to collect, among other things, the following information:  Operating system  Browser version  IP address  browser add-ons  how many times the form has been opened during the week  page load time  incomplete answers
Sources of the processed data (where data is received from)	Questionnaires on the Webropol platform are used as the data source, the link of which will be sent by email to Air Operators.
Storage period of personal data	Data will be stored until the end of 2026 at most.



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Data processing	
Recipients and cate- gories of recipients of personal data (to whom personal data is disclosed)	Personal data is stored on the service platform of Webropol Oy (ID: FI17739602). Webropol Oy and the agency have an agreement on the processing of personal data.
Processing of personal data on behalf of the controller	When answering a survey, the respondent's IP address is forwarded, but Traficom is fundamentally unable to connect IP addresses to individual answers. Webropol may not transfer personal data to third parties, except to subcontractors that the agency and Webropol have agreed upon. The following subcontractors can be processors according to the definition of data protection regulation when acting as Webropol's subcontractors in order to guarantee and improve the development work, usability and reliability of the system: Telia Cygate Oy (business ID: 0752421-0) and Qumio Oy (business ID 2466203-3).
Transfer of personal data to third countries outside the EU/EEA	Data is not transferred outside the EU/EEA countries.
Automated decision- making and profiling	Data processing does not include automatic 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 tietosuoja(at)om.fi tel. +358 29 566 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.  When answering the Air Transport market mapping study, personal information that identifies the respondent is not requested and the survey is answered anonymously. The data subject's right to access their own data can only be exercised when the data subject can be unequivocally identified from the answers given.
Right to rectification	When answering the Air Transport market mapping study, no personal information identifying the respondent is requested and the survey is answered anonymously. The data subject has the right to obtain from



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	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	The data subject has the right to obtain from the controller restriction
of processing	of processing if: - the accuracy of the personal data is contested by the data sub-
	ject;  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 portability	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.



## **PRIVACY STATEMENT**



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