

## Collecting real-world consumption data in roadworthiness testing

<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 telephone +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 telephone +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>Based on section 216 of the Act on Transport Services (320/2017), the Finnish Transport and Communications Agency Traficom maintains a Transport Register in electronic form, containing data on vehicles, for example. As part of maintaining the Transport Register, holders of inspection permit as defined in the Act on the inspection of vehicles (957/2013) who carry out periodic inspections of vehicles shall in connection with roadworthiness tests collect data as defined in section 152 a of the Vehicles Act (82/2021).</p> <p>In accordance with section 152 a of the Vehicles Act, real-world representative data as defined in Regulation (EU) 2019/631 of the European Parliament and of the Council setting CO2 emission performance standards for new passenger cars and for new light commercial vehicles, Commission Implementing Regulations (EU) No 1014/2010, (EU) No 293/2012, (EU) 2017/1152 and (EU) 2021/392 repealing Commission Implementing Regulation (EU) 2017/1153 is collected in connection with periodic roadworthiness tests. The real-world representative data together with the vehicle identification number (VIN) is collected for new passenger cars and new light commercial vehicles registered from 1 January 2021 which are equipped with on-board fuel and/or energy consumption monitoring devices in accordance with Article 4 a of Regulation (EU) 2017/1151.</p> <p>The Finnish Transport and Communications Agency Traficom reports the data to the European Environment Agency. The Finnish Transport and Communications Agency Traficom does not use the VINs and real-world representative data for purposes other than those defined in Article 12 of Regulation (EU) 2019/631. Otherwise, the Finnish Transport and Communications Agency Traficom may use the data to carry out its statutory duties.</p> <p><b>Act on Transport Services (320/2017), section 221.</b></p>	

<b>Data content</b>	
The data undergoing processing	<p>The VIN, system unique identifier, make, year of entry into service and consumption data are collected in connection with roadworthiness testing as real-world representative data in accordance with the Commission Implementing Regulation (EU) 2021/392.</p> <p>Data is collected in connection with roadworthiness tests for a maximum period of 15 years from the date on which the data on the vehicle in question was first reported to the European Environment Agency.</p>
Sources of the processed data (where data is received from)	Data is collected in connection with roadworthiness testing at an inspection station, and it is submitted to the Finnish Transport and Communications Agency Traficom using an electronic interface or via message connection.
Storage period of personal data	<p>In accordance with Commission Implementing Regulation (EU) 2021/392, the European Environment Agency stores the VINs for a period of 20 years from the date when they were first entered to the central database of the European Environment Agency.</p> <p>The VINs and real-world data may only be retained by the bodies and establishments responsible for roadworthiness tests until the information has been submitted to the European Environment Agency.</p> <p>The Finnish Transport and Communications Agency Traficom will retain the information until it is reported to the European Environment Agency annually by 1 April. After this, the Finnish Transport and Communications Agency Traficom is required to delete all submitted data from its database.</p>

<b>Data processing</b>	
Recipients and categories of recipients of personal data (to whom personal data is disclosed)	The Finnish Transport and Communications Agency Traficom submits the data to the European Environment Agency annually by 1 April regarding the previous calendar year. In addition, data is submitted individually to a party who has filed an explicit request for it. The data is never submitted as a dataset.
Processing of personal data on behalf of the controller	No other parties process data on behalf of the Finnish Transport and Communications Agency Traficom.
Transfer of personal data to third countries outside the EU/EEA	The data is not transferred outside the EU/EEA.
Automated decision-making and profiling	The data will not be processed automatically and no profiling will be conducted.

<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, Finland tietosuoja(at)om.fi tel. +358 29 566 6700</p>	
Right of access	The data content is classified as the technical information of a vehicle. It is not covered by right of access.
Right to rectification	The data collected cannot be erased or rectified because no such personal information is collected that would enable unambiguous identification of the data subject.  The data subject's right of access can be realised only if the data subject can be unambiguously identified from the provided responses.
Right to object	The data subject may object to the collection of the information at the inspection site in connection with the roadworthiness test. The information is processed in order to comply with a legal obligation, and the data subject does not have the right to object to the processing of the information.
Right to data portability	The legal basis for the processing of personal data is compliance with a legal obligation, in which case the data subject does not have the right to transfer the information from one system to another.
Right to erasure	For the Transport Register, the legal basis for the processing of personal data is compliance with a legal obligation, and this right is not applied at the Finnish Transport and Communications Agency Traficom.
Right to withdraw consent	The right is not applicable to these processing procedures, because the personal information is not processed based on the basis of the consent of the data subject (Article 6(1)(a) of the data protection regulation).