

## Pilot theory test and PEC theory test personal data register

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| <p><b>Controller</b></p> <p>Finnish Transport and Communications Agency (Traficom)</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p><b>Controller's contact details</b></p> <p>PO Box 320, FI-00059 TRAFICOM, Finland<br/>kirjaamo@traficom.fi<br/>Tel. +358 29 534 5000</p> <p><b>Contact details of the controller's data protection officer</b></p> <p>PO Box 320, FI-00059 TRAFICOM, Finland<br/>tietosuoja@traficom.fi<br/>Tel. +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>The purpose of the theory test data form is to collect the information for the completion of the pilot theory test and PEC theory test.</p> <p>The data is only used to record the results of the person who took the test and to inform the person of the result.</p> <p>The basis for the personal data processing is the controller's performance of a task carried out in the public interest (Article 6(1)(e) of the General Data Protection Regulation (2016/679) and section 4 of the Data Protection Act (1050/2018)). Under section 20 of the Act on the Openness of Government Activities (621/1999), the authorities have the duty to produce and disseminate 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. Section 1 of the Act on the Transport and Communications Agency (935/2018) requires Traficom to operate in a customer-oriented manner, drawing on multisectoral expertise.</p> <p>The pilot theory test and the PEC theory test are based on the requirements of the Pilotage act (561/2023) in section 36 Written part of the pilot examination and section 45 Written part of the PEC examination.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| <b>Data content</b>                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <p>The data undergoing processing</p> | <p>The purpose of the theory test form is to collect information on the persons taking the theory test and the completion of the test.</p> <p>The Webropol questionnaire collects information about the name, date of birth and e-mail address of the participants for the purpose of authenticating the person and providing a response.</p> <p>Webropol uses necessary cookies for the functioning of its service platform and collects the data specified below using them. These cookies are connected to the functionality and quality control of the service.</p> |

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|                                                             | <p>Webropol uses cookies to collect e.g. the following information:</p> <ul style="list-style-type: none"> <li>• Operating system</li> <li>• browser version</li> <li>• IP address</li> <li>• browser add-ons</li> <li>• number of times the survey has been opened in the space of one week</li> <li>• page download time</li> <li>• incomplete responses.</li> </ul> |
| Sources of the processed data (where data is received from) | The data source is a questionnaire on the Webropol platform. The link to the questionnaire is shared via email.                                                                                                                                                                                                                                                        |
| Storage period of personal data                             | Any personal data entered will not be stored after 2025. Webropol will store data collected through cookies for 14 days.                                                                                                                                                                                                                                               |

| <b>Data processing</b>                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| Recipients and categories of recipients of personal data (to whom personal data is disclosed) | Personal data is stored on the Webropol Oy (business ID FI17739602) service platform. Webropol Oy and Traficom have an agreement on processing personal data.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Processing of personal data on behalf of the controller                                       | <p>Webropol Oy (Business ID: FI17739602) processes the personal data and Telia Cygate Oy (Business ID 0752421-0) and Qumio Oy (Business ID 2466203-3) process the data as its subcontractors.</p> <p>Webropol may not transfer personal data to third parties, except to subcontractors agreed upon by the Agency and Webropol. 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:</p> <p>Telia Cygate Oy (business ID 0752421-0) and Qumio Oy (business ID 2466203-3).</p> |
| Transfer of personal data to third countries outside the EU/EEA                               | Personal data is not transferred outside the EU/EEA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Automated decision-making and profiling                                                       | The processing of personal data does not involve automated decision-making or profiling.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

| <b>Rights related to the processing of personal data</b>                                                                                                                                                                                                                                                                            |
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| <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> |

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

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| 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 from the controller without undue delay the rectification of inaccurate personal data concerning him or her.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Right to object                    | <p>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.</p> <p>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.</p> <p>If personal data is processed for direct marketing purposes, the data subject has the right to object to the processing without any specific grounds.</p> <p>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.</p> |
| Right to restriction of processing | <p>The data subject has the right to obtain from the controller restriction of processing if:</p> <ul style="list-style-type: none"> <li>- the accuracy of the personal data is contested by the data subject;</li> <li>- the processing is unlawful but the data subject opposes the erasure of the personal data and requests the restriction of their use instead;</li> <li>- 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;</li> <li>- 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.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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| 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. |
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