

## Membership list of the competence community of the National Coordination Centre for Cyber Security Research, Development and Innovation

<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>Traficom's National Coordination Centre processes the personal data of representatives of stakeholders included on the membership list insofar as these persons are members of one of Traficom's stakeholders. The purpose of the processing of personal data is maintaining contact and engaging in cooperation with different stakeholder representatives. Personal data is also processed for the purpose of updating contact details and managing the cancellation of competence network membership, using a separate form.</p> <p>Forms of cooperation include working groups established and events organised by Traficom and other communications, for which Traficom maintains contact and other information on stakeholders. The cooperation also includes the exchange of information regarding requests for cooperation in EU funding applications, particularly to promote pan-European consortium and project partnership cooperation.</p> <p>The basis for the personal data processing is the controller's performance of its statutory duties (Article 6(1)(c) of the EU's General Data Protection Regulation). As a national authority, Traficom's National Coordination Centre carries out tasks laid down in the regulation establishing the European Cybersecurity Industrial, Technology and Research Competence Centre and the Network of National Coordination Centres (EU 2021/887<sup>1</sup> Article 7), which include:</p> <ul style="list-style-type: none"> <li>h) promoting and disseminating the relevant outcomes of the work of the Network, the Community and the Competence Centre at national, regional or local level;</li> <li>i) assessing requests by entities established in the same Member State as the national coordination centre to become part of the Community.</li> </ul>	

### Data content

<sup>1</sup> Referenced regulation available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32021R0887> [visited on 8 May 2023]

<p>The data undergoing processing</p>	<p><b>Traficom</b> processes the following information concerning stakeholder representatives.</p> <p><b>Personal data processed</b></p> <ul style="list-style-type: none"> <li>• <b>Identifying information:</b> person's name and title</li> <li>• <b>Contact information:</b> person's email address, mobile telephone number, name of organisation</li> <li>• <b>Information concerning the organisation collected during sign-up:</b> type and industry of the organisation and what kind of communications the organisation and its representative wish to receive. In addition to these, information is collected on willingness to participate in or receive more information on cross-border EU projects, the development of cooperation or advocacy.</li> <li>• <b>Consortium and project partner information:</b> information about the research or project and the funding being applied for, insofar as they involve personal data, such as the contact information of consortium members.</li> <li>• <b>Membership and mailing list management data:</b> information on the cancellation of membership and any voluntary information provided regarding the reasons for the cancellation.</li> </ul> <p>Information is also collected utilising the <b>Webropol</b> survey platform. 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> <p>Webropol collects e.g. the following information using cookies:</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>
<p>Sources of the processed data (where data is received from)</p>	<p>To perform its statutory duties, Traficom collects data on its stakeholders and customers from the individuals filling out forms, data subjects themselves, their employers or public sources. As part of the performance of its statutory duties, the controller also identifies active operators in different industries and utilises industry publications, among others.</p>
<p>Storage period of personal data</p>	<p>The data are stored for as long as Traficom maintains the competence community and for as long as storing the data is necessary for the achievement of the competence community's objectives. Webropol stores data collected through cookies for 14 days.</p>

## Data processing

Recipients and recipient groups of personal data (Disclosure)	<p>Data can only be disclosed in accordance with the obligations and restrictions set out in currently valid legislation.</p> <p>Data is not disclosed for direct marketing purposes.</p> <p>Personal data collected via Webropol survey forms is stored on the Webropol Oy (business ID: FI17739602) service platform. Webropol Oy and Traficom have an agreement on processing personal data.</p>
Processing of personal data on behalf of the controller	<p>Webropol Oy (business ID: FI17739602) serves as the processor of the personal data and its subcontractors Telia Inmics-Nebula Oy (business ID: 2546028-1) and Qumio Oy (business ID: 2466203-3) serve as sub-processors.</p> <p>Webropol may not transfer personal data to third parties, except to specific subcontractors agreed upon by Webropol and Traficom.</p> <p>The following subcontractors may act as processors in accordance with the definition in the data protection regulations when serving as Webropol subcontractors to ensure and improve the development, usability and reliability of the system:</p> <p>Telia Inmics-Nebula Oy (business ID 2546028-1) and Qumio Oy (business ID 2466203-3).</p>
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 personal data processing does not involve automated decision-making or profiling.

<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>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 from the controller without undue delay the rectification of inaccurate or incorrect personal data.
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 their 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 the 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 data subject contests the accuracy of the personal data</li> <li>- the processing is unlawful, but the data subject opposes the erasure of the personal data and requests the restriction of its 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>
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.
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