

9.2 February 2023

Reg. no. TRAFICOM/71450/00.04.00.03/2023

## AIS SURVEY FOR MERCHANT SHIPPING

<p><b>Controller</b> Transport and Communications Agency (Traficom)</p>	<p><b>Contact details of the controller</b> PO Box 320, FI-00059 TRAFICOM, Finland kirjaamo@traficom.fi tel. +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 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 data processing</b> Traficom is conducting a survey on the understandability and reliability of AIS aids to navigation (AIS-AtoN) on merchant shipping vessels. The purpose of the survey is to examine the visibility of AIS aids to navigation on vessels and to find out how the aids are used and whether vessels have encountered any problems with them. Completing the survey is entirely voluntary.</p>	

Data content	
<p>The data undergoing processing</p>	<p>The survey is used to collect data on the ability of vessels to display and receive AIS-AtoN transmissions. The respondents are not asked to provide personal data or contact details. Any personal data entered in open responses will be removed and Traficom will process the responses anonymously. 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. Webropol uses cookies to collect e.g. the following information:</p> <ul style="list-style-type: none"> <li>- operating system <ul style="list-style-type: none"> <li>- browser version</li> <li>- IP address</li> <li>- browser add-ons</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <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. Email addresses have been retrieved from the vessel data included in the IB-net system.
Storage period of personal data	Any personal data included in open responses are stored for a maximum of two months after the survey is closed. Webropol will store data collected through cookies for 14 days.

<b>Data processing</b>	
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. The only piece of personal data transmitted through the survey is the respondent's IP address. As a rule, Traficom is not able to connect the responses given to individual respondents.
Processing of personal data on behalf of the controller	The only piece of personal data transmitted through the survey is the respondent's IP address. As a rule, Traficom is not able to connect the responses given to individual respondents. Webropol may not transfer personal data to third parties, except to specific subcontractors agreed upon by Webropol and Traficom. 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: Telia Inmics-Nebula Oy (business ID: 2546028-1) and Qumio Oy (business ID: 2466203-3).
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	Data processing does not involve automated decision-making or profiling.

#### **Rights related to the processing of personal data**

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### 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.

The Office of the Data Protection Ombudsman  
PO Box 800, FI-00531 HELSINKI, Finland  
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. The only piece of personal data transmitted through the survey is the respondent's IP address. As a rule, Traficom is not able to connect the responses given to individual respondents.
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. The only piece of personal data transmitted through the survey is the respondent's IP address. As a rule, Traficom is not able to connect the responses given to individual respondents.
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>

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	<p>If personal data are 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> <p>The only piece of personal data transmitted through the survey is the respondent's IP address. As a rule, Traficom is not able to connect the responses given to individual respondents.</p>
Right to data portability	<p>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. The only piece of personal data transmitted through the survey is the respondent's IP address. As a rule, Traficom is not able to connect the responses given to individual respondents.</p>
Right to erasure	<p>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</p>

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	erased unless the controller has a legal basis for refusing to erase the data, such as a legal obligation to retain the data. The only piece of personal data transmitted through the survey is the respondent's IP address. As a rule, Traficom is not able to connect the responses given to individual respondents.
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.