Trafi Data Balance Sheet 2018

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## 1. Foreword by the Director General of Data and Knowledge

The year 2018 will be remembered for the implementation of the GDPR. The private and public sector are ready for the new data-based world. Or are they? It is not possible to completely prepare for everything, and nothing is completed in a moment. The issue is nevertheless extremely important, and now it has received the attention it deserves. The official data collected and utilised in transport and communications affects almost all Finns: Citizens, businesses and authorities - the whole of society. Therefore, taking care of this data is far from a trivial matter. It is also important to be able to demonstrate openly and understandably how this is done. Understanding increases trust. This year's Data Balance Sheet aims to increase understanding and trust in the same way as those of previous years.

The digital environment is developing rapidly, and this rapid development is difficult to precisely predict. As the opportunities grow, so do the potential problems – and vice versa. We can also look at threats as opportunities to increase our competitive advantage. As a country which guarantees the quality of data protection, Finland can be generating and implementing the kinds of new services which will be successful precisely because of their reliability. Being a pioneer always involves risk. The purpose of Trafi's driver information service was to produce easily and digitally data which would be of use to both businesses and citizens. Unfortunately, the displaying of too much data generated potential risks of data misuse, and so the service was temporarily closed at the end of last year. Now the service has been changed so that it no longer contains data which is unnecessary for minimum service provision. Before reopening the service, we will be carrying out a broad examination of data protection and information security matters in order to ensure service reliability.

There is always a paradox involved in the openness of data. The more data there is available, the more this can be used in both beneficial and harmful ways. Finding the balance has to be the focus of all action. To begin with, the precautionary principle will most likely be applied in many situations. However, by avoiding mistakes we can end up stifling innovation, and the new global super-services will remain undeveloped, or they will be developed somewhere else. On the other hand, avoiding critical errors is at least as important a factor as the above for achieving success. In any case, it seems that we are on the right path. We have wanted to establish data protection matters as a key component of our daily operations, rather than leaving them as an encumbrance and topic for background papers.

This 2018 Data Balance Sheet will be Trafi's last. On 1 January 2019. Trafi. the Finnish Communications Regulatory Authority FICORA and the Finnish Transport Agency were combined into a single agency. The newly formed Finnish Transport and Communications Agency Traficom will be continuing on the same course with its data balance sheets. We have already refreshed the report's outward appearance and content, but without compromising on the core message. The purpose is to demonstrate our accounting capacities in accordance with the GDPR. We openly detail both the successes and the areas that need improvement. The new agency is even better equipped to respond to the challenges of a digitalising world and to increase the trustworthiness of authorities' actions. Cooperation with other authorities and with businesses and citizens is essential for success. Our gaze looks ahead and our course is set towards the future!

Director General of Data and Knowledge Juha Kenraali



## 2. Introduction

The Trafi Data Balance Sheet has a different shape to previous years. We have changed the earlier broad and even textbook-like publication detailing the organisation's data into a more compact yet more informative description of the organisation's accounting capacity.

Building trust and recognising our own responsibility are central goals in our processing of personal data. This year's Data Balance Sheet focuses on the essential elements for achieving these objectives: ensuring information security, giving due consideration to data protection, and carrying out information management. This Data Balance Sheet details the current situation and volumes for these elements and maps out the developmental steps towards their implementation which Trafi took in 2018. The central purpose of the GDPR is to provide data subjects with ever better opportunities for managing their own personal data and to facilitate the acquiring of information about the processing of their own personal data. In the Data Balance Sheet, we lay out Trafi's digital methods for implementing the rights of data subjects and give details of how many data subjects have used these rights.

Data inventory and data flow descriptions have from the outset been a central part of the Trafi Data Balance Sheet. Through the introduction of the Transport Services Act on 1 July 2018, Trafi's core registers were brought together in the Transport Register. In this Data Balance Sheet, we describe the data flows and register data content as they are in the new Transport Register as well as the data sources for the Transport Register and the recipients of disclosed data.

# 3. Information security

### DEVELOPING A CULTURE OF DIGITAL SECURITY

By developing the attitude, expertise and knowledge for digital security throughout the organisation, we are able to integrate information security into all our operations.

### 2018:

- Data classification training and study material for all personnel
- 'GDPR and digital security' event for all personnel
- Orientation package of information security instructions
- Information security videos on various topics for all personnel
- General communications: Bulletins and instructions regarding threats

### SITUATIONAL PICTURE

By creating an up-to-date and comprehensive situational picture of our operating environment and its development, we can understand current and future threats and our own capacity to respond to them.

### 2018:

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- Developing processes for monitoring threats
- Specification of digital security indicators

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We recognise, analyse and monitor the information security requirements originating from legislation and the business sphere and then apply these to the operating environment.

#### 2018:

- Development of the management and description of requirements
- Data classification currently under way
- Updating of business continuity planning
- Implementation and continual development of changes required by the GDPR
- Updating of the information security appendix in partnership agreements

## INFORMATION SECURITY CERTIFICATIONS AND AUDITING

Internal and external audits and checks to support continual development of information security and indicate current level of information security

#### 2018:

- ISO27001 annual monitoring assessment
- Partner audits
- Audit of customer services in connection with data protection controversy: 'Level of information security is above-average'

#### MANAGING DIGITAL SECURITY RISKS

Risk-based planning efficiently guides the measurement and allocation of digital security management methods. These management methods cover threat identification, self-protection, and detecting and reacting to incidents.

#### 2018:

- Regular analysis of digital security risks and acceptance of residual risks. Also a strengthening of the role of critical ICT service providers
- Information security analyses, tests and statements on all development tasks
- Development of user rights management: Connecting of new entities to centralised user rights management and clarification of user rights roles
- Development of access management: Connecting new entities to centralised access management
- Implementation under way of new endpoint protection solution for all workstations, information security services for mobile devices implemented
- Development of log management: Modernisation of centralised log storage solution and development of management processes currently under way
- Automated monitoring of application library vulnerabilities, implementation in process
- Automated information security testing POC initiated

### THREATS •

We identify and analyse the most likely threats to digital security, including:

### 2018:

- Vulnerabilities
- DoS attacks and other threats related to service availability
- Malware
- Phishing

### INCIDENT MANAGEMENT

Measures for managing information security incidents seek to limit the impact of the incident and return operations to a normal state. Root cause analysis is carried out on the incidents and corrective measures are planned. Deliberate attacks and misuse are reported to the police.

### 2018:

- Strengthening of incident management processes of information security incidents
- Consideration of data protection requirements in the handling of incidents
- Taisto18 exercise

# 4. Data protection



#### **PROCESSED LOG DATA REQUESTS**

**CITIZENS** 

**AUTHORITIES** 

#### PERSONAL DATA BREACHES

A data breach is a situation where the personal data under the responsibility of the controller is either destroyed, changed, disclosed without permission or accessed by a party that does not have the right to process the data. The GDPR obliges the controller to report personal data breaches to the supervisory authority and/or to the data subject, depending on the nature of the risk that the breach is likely to cause to the rights and freedoms of natural persons.

In 2018, Trafi made two reports of data breaches to the Office of the Data Protection Ombudsman, which functions as the supervisory authority.

### **DEVELOPMENT OF LOG MANAGEMENT**

Log data is processing data saved in the log registers of Trafi's official systems, such as the vehicle information system. One of the purposes of this information is to ensure legal protection for the users and the data subjects. Log data can be used to reliably demonstrate who has or hasn't carried out particular actions in the data system or in other environments which collect log data. Log data can be disclosed to citizens in certain situations, such as when there is reason to suspect inappropriate processing of data or misuse. Log data is also disclosed to authorities for use in pretrial investigations. Trafi initiated a centralised log management project which seeks to develop a new log management system with greater information security. In addition, efforts have been made to speed up the processing of citizens' log data requests.

## TRAININGS ON DATA PROTECTION AND INFORMATION SECURITY

The Trafi data protection working group organised a data protection training for all personnel on 22 May 2018. Trafi personnel also participated in the video training organised by the Advisory Committee on Information Management in Public Administration (JUHTA) and the Government Information Security Management Board (VAHTI). In addition, the Information and Statistics unit organised both an internal training and also training for data disclosure partners.

Trafi Information and Statistics unit actively provided guidance on data protection matters to both internal and external customers. As well as providing general and a specific guidance and advice, the unit also issued comprehensive written instructions on the processing of personal data.

### REQUESTS FOR STATEMENTS ON DATA PROTECTION MATTERS

OFFICE OF THE DATA PROTECTION OMBUDSMAN

PARLIAMENTARY OMBUDSMAN

### **CHANGES TO LEGISLATION**

Following the introduction of the EU's General Data Protection Regulation, a number of national laws containing provisions on the processing of personal data have been amended. Trafi contributed to this legislative reform process by issuing statements on many government proposals. In addition, Trafi was involved in drafting the government proposal on changes to the Driving Licence Act which enabled the introduction of a mobile driving licence.

Trafi also closely followed the drafting of the Finnish Data Protection Act. The Act entered into force on 1 January 2019.

## MEDIA CONTROVERSY REGARDING THE PUBLIC DRIVER INFORMATION SERVICE

The public driver information service was launched in its current form for the first time on △ July 2018. In order to assess the discussion generated by the service in the social media and the issues raised in other media channels, the public driver information service was temporarily closed on 9 December 2018. The Ministry of Transport and Communications requested that Trafi investigate its practices regarding the planning, production and maintenance of its electronic services. The Ministry wanted the report to focus particularly on questions of data protection and information security. At the same time, the Ministry of Transport and Communications encouraged all public administration organisations to make use of the results of the analysis for ensuring data protection and information security within their own services.



# 5. Information management

At Trafi, information management services were used to produce and develop customer-orientated information management that supports business activities. The purpose of information management is to ensure compliant storage and accessibility of data regardless of the form of storage. In addition to traditional archives, case management and document management, information management also covers areas such as support services for document management and register information management.

Efforts are made to implement and develop information management in an increasingly comprehensive manner which takes into account the different forms, purposes and life-cycle stages of the data. Systems development and integrations into operating environments are also an important part of an information management approach which seeks to facilitate the data processor's work and improve opportunities for data utilisation.

# 5.1 Information management measures

### **ASHA PROJECT**

The ASHA project, initiated by Trafi in 2014, is in its final stages. The project centralised, developed and automated Trafi's case management processes and document management systems. The goal has been to achieve cost savings in business operations and streamline the work process, but attention has also been paid to introducing best practices for information management into the daily work of every Trafi official. The main guiding principles behind the project were customer focus, digitalisation, and increasing the efficiency and clarity of processes.

ASHA's four sub-projects represented the project's different stages. All the projects reached completion in 2018, and all that remains now are a few tasks that need implementing and the final work to finish the project off. The project succeeded in significantly reshaping the agency's case and document management systems and in integrating operating models into the daily work of data processors.

### ASHA PROJECT OUTPUTS

- Portti user interface case management system for Tweb
- Up-to-date information management plan
- National Archives Service decision on documents for permanent storage
- Permit for digital document storage
- Updated, user-friendly digital workspaces with archive integration
- Archive for individual or batch archiving of documents not related to case management
- Search interface for finding documents and cases
- Capacity to handle structured, multisection documents

### STAGES OF THE ASHA PROJECT

### **STAGE 1**

### UPDATING THE INFORMATION MANAGEMENT PLAN

By updating the information management plan in accordance with the Sähke2 requirements, the groundwork was laid for enabling changes such as the automation of case management processes and the introduction of digital signatures. The information management project worked through and described around 850 subject groups, which represent Trafi work tasks.

### STAGE 2 IMPROVING CASE MANAGEMENT USABILITY

The Portti user interface, used for handling case management processes, was designed and implemented. The design of this interface took into account both user suggestions for improving usability and methods for improving process efficiency, such as the introduction of digital signatures. The case management system itself remained the same, although it is now accessed via the user interface.

### STAGE 3

### DEVELOPMENT OF DOCUMENT MANAGEMENT AND IMPLEMENTATION OF DIGITAL ARCHIVE

Digital workspaces were developed to better support document management and digital working. The project also implemented Holvi, a digital archive into which documents can be archived from digital workspaces via an integration and cases can be transferred into storage from the active case management.

### STAGE 4

### DEVELOPMENT OF CASE, RECORD AND DOCUMENT MANAGEMENT AND IMPLEMENTATION OF BEST PRACTICES FOR INFORMATION MANAGEMENT

In the final stage, overlapping case, record and document management systems were identified. Efforts were made to import records and documents into the user-friendly and efficient systems created earlier in the project. The project also extracted documents from overlapping data systems and implemented best practices for information management among all Trafi personnel.

# 5.2 Management of register data

The register information management project (REHA) was initiated by Trafi in 2015 and reached completion in September 2018. The project implemented a registered management model and related instructions and templates, a description of the register information management support service, a maintained index of Trafi's registers and model templates for privacy statements and records of processing activities. Through the project, Trafi took into use relevant practices that conform to the JHS 201 'Meta data model of register data'. The recommendation specifies the common metadata for describing public administration registers and their content. The goal of the recommendation, and one shared by the REHA project, is to standardise register descriptions and support the management of the data life-cycle.

Through the Act on Transport Services (320/2017), nearly all of Trafi's registers were integrated into the Transport Register. In the coming year, a more

### REGISTER INFORMATION MANAGEMENT IS CARRIED OUT THROUGH THE FOLLOWING PROCESSES:

- Register identification and delimitation
- Description of register's data content
- Creation of register privacy statement
- Maintenance of register index
- Creation of register value attribute

detailed description of the Transport Register will be carried out and a storage period decision will be sought from the National Archives of Finland regarding the storage of register data.

# 5.3 Information management figures

In 2018, Trafi processed around 580,000 cases through the case management system. The matters became pending in connection with licences, approvals and decisions either through electronic channels or as paper documents via the registry. Paper documents received were digitalised in a centralised manner and then processed digitally through the case management system.

Of the total number of cases, around 15% were inputted through the centralised registry service. The majority of cases became pending automatically via operational systems or electronic services. Case management work in 2018 involved a total of around 900,000 documents. The large number of cases and documents sets high requirements both for the systems and the centralised services.

From the beginning of June, the issuing and supervision of transport licences (taxi, goods and passenger transport licences) was transferred from the ELY Centres to Trafi. A total of 72 pending cases were transferred from the ELY Centres to the Trafi case management system. Closed, already processed cases were transferred from the ELY Centres' case management system to Holvi, the Trafi digital archive. These totalled 23,000 cases comprising 50,000 documents. At the same time, a second system was introduced alongside the Trafi case management system for the management of transport licence cases. A project was initiated for updating the transport licence systems, and this project will also involve transferring the case management into the centralised case management sphere. In 2017, Trafi received a screening decision from the National Archive of Finland which stated that the agency's documents will be primarily stored only in electronic form. The quantity of traditional paper records has already been slightly reduced. Compared to the previous year, the quantity of paper archives decreased in 2018 by 200 shelf metres.

During the same year, Trafi digitalised around 2.3 million documents related to road transport, including documents on inspections and registrations. In total, there are around 42 million digitalised documents in the vehicle data system. Documents to be digitalised are normally processed by the service provider, so when they are delivered to Trafi they no longer require further processing in case management.



# 5.4 Development of data architecture

The importance of data architecture is becoming more a more prominent as society becomes increasingly digitalised. Data architecture is one of the most challenging aspects of the enterprise architecture due to its broad scope. For this reason, it is worth specifying what data architecture means and what its significance is within the organisation.

In general, data architecture is seen as comprising conceptual models, data models and descriptions of an organisation's data capital. And this is indeed what it is in practice as well. The descriptions can be divided into the logical and physical levels. Logical level descriptions are descriptions of the data needed for business activities, and they normally answer the question "how". Physical level descriptions come closer to the data system architecture and generally describe the physical level answers the question "where".

With some of the models and descriptions, it is possible to describe the organisation's entire data capital at a high level. These descriptions can be utilised, for example, for describing the data capital to those outside the organisation and for knowledgebased management within the organisation. More detailed descriptions, meanwhile, can be utilised for business needs and development tasks. At the lowest, broadest level, data architecture descriptions are very close to physical data descriptions, such as the content of an operational data system used for business activities.

During 2018, a survey of the current state of Trafi's data architecture was carried out with a view to

further development of this architecture. The survey was carried out by examining data architecture descriptions and interviewing the most important data architecture stakeholder groups. Trafi has been describing data architecture as part of the enterprise architecture for several years already. Data architecture descriptions have been primarily created in connection with development tasks. The summary of the current situation recognised that the data architecture descriptions are of widely different standards and that there are no actual instructions for data architecture creation.

### DATE ARCHITECTURE AT TRAFI

To begin the data architecture development process, the significance of data architecture in Trafi was defined. In general, data architecture is seen as comprising conceptual models, data models and descriptions of an organisation's data capital. This is also the case in Trafi, where data architecture is seen as providing the models and frameworks for data descriptions and maintaining key data-related variables such as identifiers and concepts. Data architecture functioned as a support service and a maintainer for data description, centralised identifiers, codes, terminology and concepts. Data architecture also offered support to development tasks in the description of the data under development.

The objective of data architecture development was to identify all Trafi data, derive the data groups from this, create a data catalogue and describe the data in conceptual form. Another objective was the initiation of agency-level terminology work. As part of the development work, shared description models or tools were implemented for the purpose of standardising data architecture descriptions.

### DATE ARCHITECTURE OBJECTIVES

The objective is for all transport data to be described in a single data catalogue from which it is easy to present data for different uses. Primary data groups have been defined, and the data is organised into these according to the different data subgroups. This data grouping can be utilised in many different tasks, such as register description. The Transport Register, which came into force with the introduction of the Act on Transport Services, is incredibly broad in scope, and it is a large challenge to produce a description of it as a single register. The plan is to carry out the description work according to data group or data resource.

As part of the data grouping process, the intention is also to form a conceptual model which can be used for speaking a common language about transport data both within and outside of the agency. A further goal is to initiate terminology work during 2019.

For the development tasks and other core functions. the concept models for the target are produced. These models lay out the core concepts within the task area in question and the relationships between these concepts. Also, data models are created for the data from the data systems being developed through the development tasks and from other core data systems. Using these models, it is easy to see what data and data types the data systems contain. Data flowing within the interfaces is also described in the data architecture. Additionally, relationships between data and data flows are described in such a way that they can easily be applied to various uses. The goal is to create data standards for the most important data, such that these can be used to standardise some data entities that are in use in multiple locations. This kind of data entity is created, for example, for means of transport.

The means of transport data entity will show what data and data types the means of transport contains. Means of transport include vehicles, rolling stock, aircraft, vessels and watercraft.

Centralised instructions and models are provided for business operations for creating useful data descriptions in everyday operations and development tasks.



## 6. Data services



### 6.1 Data disclosure figures for 2018

340,000 **NON-DISCLOSURE OF DATA** Individuals who have prohibited 339,071 the disclosure of their data in some way 337,554 Non-disclosure for direct marketing Non-disclosure as individual 267,069 disclosure Non-disclosure for transport-263,955 related purposes Non-disclosure in open interfaces 25,538 Non-disclosure for development 23,729 and innovation purposes Orders of non-disclosure for 9,848 safety reasons

In 2018, around 340,000 individuals within the Transport Register prohibited the disclosure of their data in some way.

The table gives the precise numbers for each type of non-disclosure. One individual may have several types of non-disclosure in force at the same time. Companies and organisations may not restrict the disclosure of their data for activities other than those involving development and innovation. Applications for orders of non-disclosure for safety reasons are made to the local register office and entered into the Population Information System which it maintains.

The most commonly used type of non-disclosure is the non-disclosure for direct marketing, which prohibits the personal data from being handed over for direct marketing. This prevents the individual from receiving marketing messages from, for example, vehicle inspection companies or car dealerships. **32,000** OPEN DATA DOWNLOADS

Open data is composed of data resources which are free to use and available for public use.

In total, around 32,000 open data downloads were made in 2018. The most popular was data on rolling stock.

The data available for download is updated quarterly and the data is published in CSV form.

Open data is raw data from the register. It has received either no processing or minimal processing from the publisher. The processing and utilisation of the data are the tasks of the external parties, and this includes also the development of ideas for data utilisation.

### 91.6 million **DATA UNITS** DISCLOSED FROM THE DATA RESOURCES

Address resale	20,921,534
Market data	4,937,564
Batch services	65,732,044

Resources refers here to the register data resources on road transport supplied to Trafi's partners based on agreement or data permits. Register data is mostly disclosed through batch services.

These are regular samples taken at specific intervals from the Transport Register. Batch service resources are utilised, for example, in insurance change events or driver-related events. Market data resources are used, for example, to carry out statistical or market analyses. Address resale resources are utilised in areas such as direct marketing (vehicle inspection offers, car dealership sales campaigns).





6.06 million **INDIVIDUAL QUERIES REGARDING PUBLIC REGISTER DATA** SERVICES

Public register data services are data services within Trafi's electronic services which are aimed at Finnish citizens. The data available within the services is public register data on which individual searches can be made. The content of the register data varies depending on the publicity of the data, the means of transport and the date on which the means of transport was registered.

- Direct queries, statutory 8,470,474 duties (ATJ)
- Direct queries, authorities (ATJ) 1,773,667
- Application-application gueries 13,008,095 by public authority application
- Partners' agreement-based 17,961,798 queries
- TILU 56,028,307 208,07
- Vessels and watercraft

97.5 million DATA UNITS DISCLOSED VIA INTERFACES (API)

In 2018. a total of around 97.5 million data units were disclosed via Trafi's software interfaces (API).

Direct queries refer to gueries made by public authorities or organisations directly to the Trafi register data system. User rights within the system are granted for carrying out statutory duties (inspection stations, insurance companies) or for official use (police, customs, border guard).

The interface can be used to make queries and application-to-application gueries in machinereadable form. This interface is utilised by various bodies, including insurance companies (insurance offer calculations), authorities, and partners (e.g. registration plate search services, appointment booking services, repair services, and towing services).

Interface gueries to the centralised databank (TILU) come, for example, via electronic services and from official queries. Queries to the vessel and watercraft interface come from official queries, among other sources.



# 6.2 Digitalisation of services in accordance with the GDPR

One of the purposes of the GDPR has been to provide data subjects with better opportunities for managing their own personal data and to facilitate the acquiring of information about the processing of one's own personal data. At Trafi, the data subject's right to access their own data (right to examine data) and the right to rectify one's own data were implemented by creating electronic forms that were integrated into Trafi's My e-Services. My e-Services already offered larger amounts of information relating to the data subject, so it was assumed that a moderate amount of data requests will be made using the data access form. The number of data requests exceeded, however, both the expectations and the resources allocated for processing them. The form for rectifying one's own data was also used more actively than Trafi expected. The majority of the rectification requests sent using the form did not, however, relate to the rectification of one's own data as defined in the GDPR.

Because of these problems, the forms for data access requests and data rectification requests were removed from the electronic services and replaced with a PDF form.

Trafi implemented a non-disclosure management service in order to support the data subject's right, as detailed in the GDPR and the Act on Transport Service, to decide on the disclosure of their personal data for purposes stipulated in the law. The service was launched on 19 August 2018 within Trafi's My e-Services. Users logged into the management service may examine currently valid nondisclosures and add to or remove them.

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# 7. Trafi data flows

The register data collected as part of Trafi's statutory duties was included in the Act on Transport Services (320/2017), which came into force on 1 July 2018 and which integrated all Trafi registers into the Transport Register.

Due to this legislative change, fresh development of Trafi's data resources was also initiated with an eye to the new Transport Register.

With regards to data flows, the 2018 Data Balance Sheet summarises the Transport Register's data content at the general level as well as the register's data sources and disclosure recipients. The data storage periods have also been added to the data flow description.



### THE TRANSPORT REGISTER IS USED FOR

- issuing and monitoring of transport licences and other permissions,
- improving transport safety,
- identifying means of transport and associated taxation and charges,
- reducing environmental impact,
- promoting the development and use of mobility services,
- enabling research, development and innovation activities,
- promoting services based on people managing their own data,
- providing public transport-related services and fulfilling international obligations.

Trafi has the right to use the data in the register for carrying out its statutory tasks.

### 7.1 Data saved in the Transport Register

### DATA FOR THE TRANSPORT REGISTER IS RECEIVED/OBTAINED FROM THE FOLLOWING BODIES:

- Licence applicants and licence holders
- Those engaged in activities subject to notification
- Owners, holders and users of means of transport
- Manufacturers and importers of means of transport or the motors for them, or representatives of such organisations
- Educational institutions, training organisations and those receiving proficiency tests
- Doctors, psychologists, and communities or institutions engaged in nursing or healthcare activities.
- Manufacturers and processors of licences and cards
- Those engaged in railway transport between Finland and Russia.
- Those carrying out registration work, operators carrying out surveys and inspections, those granting individual approvals, and other contracting partners of Trafi.
- The Motor Insurers' Centre and insurance companies
- Ship operators and shipping companies
- Other authorities

## FOR NATURAL PERSONS, THE FOLLOWING DATA IS SAVED

- Personal identity code
- Gender
- Date of birth (if no personal identity code)
- Nationality
- Home municipality
- Name
- Signature sample
- Address or other contact information
- Birth date, municipality and state
- Information on whether the person is alive or deceased
- Photograph
- Business ID
- Mother tongue and communication language

### MOST ESSENTIAL USE-RELATED DATA FOR NATURAL PERSONS, LEGAL PERSONS OR MEANS OF TRANSPORT:

- Mortgages
- Bankruptcy
- Statutory fees, taxes and their payment
- Persons working as seafarers on Finnish vessels
- Seizure
- Card data from road transport recording equipment
- Debt recovery procedures
- Sequestrations
- Insurances
- Parking permits for people with disabilities
- Licence issue and cancellation
- Debt restructuring
- Company restructuring

#### DATA RECORDED FOR LEGAL PERSONS:

- Auxiliary business name
- Communication language
- Domicile
- Name
- Address and other contact information
- Information about the organisation's other persons responsible, and identification and contact information for persons responsible
- CEO
- General partner
- Company ownership
- Business ID

### DATA RECORDED FOR CARRYING OUT STATUTORY TASKS:

- Driving bans
- Other related sanctions
- Sentences received for offences committed
- Offences committed
- Sanctions imposed as an outcome of monitoring tasks

## DATA WHICH MAY BE RECORDED FOR PERSONAL LICENCES:

- Issued or cancelled licence
- Licence conditions
- Licence dispensations
- Licence changes
- Licence applications denied
- Licence issuer and home state
- Application and processing of licence, qualification, approval or competency
- Training and experience
- Tests and assessments
- Required language skills
- Health condition and details of examinations made by a doctor or psychologist
- Issuing, cancellation, disappearance and destruction of cards and certificates relating to licenses, qualifications, approvals, and competencies
- Any other data to be recorded in the Transport Authority's registers in accordance with EU legislation and international agreements.

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#### DATA RECORDED FOR OPERATOR'S LICENCES:

- Data used for assessment of good repute and reliability
- Data on processing of notifications
- Data on operations subject to notification
- Licence content
- Licence conditions
- Licence number
- Data on licence application and processing
- Changes to licence
- Data on issuing of licence and on the requirements for creating the registry entry on operations subject to notification
- Licence period of validity
- Issuing or cancellation of licence
- Data on incident reports
- Data on undertakings classed as posing an increased risk

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#### DATA RECORDED FOR MEANS OF TRANSPORT:

- Appropriation data
- Management data
- Holder data
- History
- Approval data
- Inspection data
- Commercial data
- Bodies responsible for maintenance
- Maintenance data
- User data
- Data on prohibitions of use
- Data on restrictions of use
- Data on purpose of use
- Data on commissioning
- Data on decommissioning
- Classification data
- Other registration data
- Other data on technical inspections

- Ownership data
- Construction data
- Registration number and other identifying and numbering data
- Technical data
- Data about domicile and operating area
- Data about official inspections
- Data on temporary use



### 7.2 Storage periods for data saved in the Transport Register

- Data on personal licences is removed when the personal data is no longer needed for the purpose it was recorded for, or at the latest
  10 years after the expiry of the licence.
- Railway qualification data 10 years after the expiry of the authorisation.
- Seafarers' seagoing service, training and competency data – 70 years after the data registration.
- Personal data no later than 10 years after the death of the person, unless data has already been deleted for some other reason.
- Information on the data subject's health condition – as soon as the data is no longer needed.
- Data on criminal offences and their related sanctions – as soon as they have become obsolete.
- Operating ban on a data subject or other administrative measure taken by Trafi or the Police – 10 years after the decision has entered into force.
- Data relating to operator licences 6 years from after the withdrawal or expiry of the licence.

# 7.3 Disclosure of data from the Transport Register

Data from the Transport Register may be disclosed

- through an interface
- using a viewing connection
- by other electronic means

Interfaces are data transfer solutions that enable electronic data transfer between two or more data systems.

Examples of viewing connections would include the disclosure of data which takes place in My e-Services and the direct use solutions used in the exchange of data between authorities.

Other electronic means include, for example, the disclosure of data via email.

Trafi decided on the disclosure of data.

## STORAGE OF INFORMATION ON MEANS OF TRANSPORT

- Personal data relating to means of transport – 10 years after the means of transport is permanently deleted from the register.
- Data on means of transport is stored permanently.
- Data found to be erroneous and marked as such – up to 5 years from the error being detected, if retention is necessary to protect the rights of the data subject, another party involved or the controller.

## EVERYONE HAS THE RIGHT TO OBTAIN AS AN INDIVIDUAL DISCLOSURE

- the following data on operator licences, upon providing a business ID, company name or licence number:
  - name and contact information for licence holder
  - licence number
  - licence period of validity
  - name of person responsible
- If the operator is a natural person, the following data may be obtained upon provision of their first name and surname, personal identity code or some other identifier:
  - operator's name
  - work contact details
  - licence number
  - licence period of validity

### THE ABOVE DATA MAY ALSO BE DISCLOSED FOR THE FOLLOWING TRANSPORT-RELATED PURPOSES:

- Providing and developing transport services
- Public opinion surveys or market research, direct marketing and other address and data services
  - Updating the contact details and means of transport data entered in the customer database
- Other such purposes approved by the controller

Disclosed data may only be used for the purpose for which it was disclosed. Data may be disclosed or otherwise provided to third parties only if this is based on either Finnish law, obligations of international agreements that are binding on Finland, European Union legislation, or specific permission received from Trafi.

### DATA ON RIGHTS TO DRIVE PARTICULAR

**MEANS OF TRANSPORT** or other data on the validity and scope of personal licences may be provided as an individual disclosure upon provision of the person's first name and surname, personal identity code or some other identifier.

### THE FOLLOWING DATA MAY BE DISCLOSED THROUGH AN OPEN INTERFACE

- Data on operator licences
  - Licence number Name of licence holder Contact details for license-related operations Contact details relating to operations subject to notification
- The following data is recorded in the Transport Register in such a way that it cannot be connected with natural persons.

The following data may be provided as individual disclosures based on a **MEANS OF TRANSPORT** identifier

- Means of transport
- Owner and holder
- Name of user or representative
- Address or other contact information
- Inspections
- Taxation
- Mortgages
- Insurance holders
- Limited data on former owners or holders of the means of transport

### DISCLOSURE OF DATA FOR DEVELOPMENT AND **INNOVATION ACTIVITIES**

In individual cases, data from the Transport Register may also be disclosed for development and innovation activities aimed at developing and providing the transport system and services, increasing awareness and understanding of it, improving traffic safety and promoting the environmental goals of transport.

Confidential data may be disclosed only with the individual's consent and in such a form that it cannot be connected with individual persons. Data obtained from the register of fines or the Police Information System may be disclosed only in a form which cannot be connected with individual persons.

An applicant requesting data on development and innovation activities must provide an explanation which is sufficient for confirming the necessity of the requested data for the use described, the secure processing of the data, and the applicant's trustworthiness.

The data disclosed may be used only for the purpose for which it was disclosed. The data must be deleted as soon as it is no longer needed for this purpose, and it must not be disclosed to third parties.

#### MANAGEMENT OF ONE'S OWN DATA Data

subjects can access and copy their own data to another data system in machine-readable form through an open interface. This does not apply to confidential data which has been obtained from the register of fines or the Police Information System, nor to monitoring and sanction data.

### **DISCLOSURE OF DATA TO OTHER AUTHORITIES AND THOSE CARRYING OUT** STATUTORY DUTIES

Trafi may disclose data to another authority or other person carrying out a statutory duty to the extent necessary for carrying out the duty without being impeded by confidentiality rules. However, confidential information that has been gained from the register of fines or the Police Information System is not disclosed unless otherwise mandated by law.

Data in the registry may be disclosed to foreign authorities or for official functions if the disclosure is provided for in Finnish law, European Union law or through an international agreement binding on Finland. If personal data is transferred outside the European Economic Area, the conditions of Chapter V of the European Union's General Data Protection must be fulfilled. Another authority that receives data from the Transport Register may disclose that data to a third party if the same conditions above are met.







### 7.4 Restriction of disclosure of data from the Transport Register

### **RESTRICTION OF DATA DISCLOSURE**

A natural person has the right to prohibit the disclosure of personal data through an open interface for both transport-related purposes and development and innovation activities.

In addition, a natural person has the right to prohibit the disclosure of their contact details as an individual disclosure.

A legal person has the right to prohibit the disclosure of their data for development and innovation activities. Processing of the data of persons subject to an order of non-disclosure for safety reasons is regulated by sections 36 and 37 of the Act on the Population Information System and the Certificate Services of the Population Register Centre (661/2009). When transferring the order of non-disclosure to the Transport Register, the disclosure restriction is expanded to cover also the name of the natural person.

An order of non-disclosure does not restrict the disclosure of the data to public authorities or for the carrying out of statutory duties.

When receiving a disclosure of data which is subject to an order of non-disclosure, the recipient of the data disclosure is also notified of the non-disclosure and the restrictions relating to the use and protection of the data.

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