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Practices for processing personal data at the Finnish National Gallery

The processing of personal data at the Finnish National Gallery is founded on the EU General Data Protection Regulation 2016/679 and the Finnish Personal Data Act 523/1999. This Finnish National Gallery privacy policy describing the processing of personal data will be updated after the new Data Protection Act has been passed in the Parliament of Finland.

Background for processing personal data at the Finnish National Gallery

The Finnish National Gallery was established by the Finnish National Gallery Act 889/2013 to bolster cultural heritage and to promote awareness of art. It is a public foundation that falls under the jurisdiction of the Finnish Ministry of Education and Culture (Finnish National Gallery Act, section 1). The Finnish National Gallery comprises the Ateneum Art Museum, the Museum of Contemporary Art Kiasma, and the Sinebrychoff Art Museum. The Finnish National Gallery also includes the Archive Collection, which is the most comprehensive body of documentary materials related to the visual arts in Finland.

The task of the Finnish National Gallery is to maintain and enlarge its collection, organise exhibitions and other art museum activities, and participate in an expert role in the development of the field of art museums (Finnish National Gallery Act, section 2).

Personal data is processed at the Finnish National Gallery museums and other units in order to carry out the tasks mentioned above, as prescribed in the law. To fulfil its tasks, the Finnish National Gallery units

- maintain and develop an art-historical data bank, which is a research archive including documents, images, audio-visual recordings, newspaper cuttings, printed products, and sketches related to artists and the art world in analogue and digital form;
- serve researchers and customers through the publication of archival materials, and keep these available within the framework of existing legislation and the restrictions on use specified in donation agreements;
- cooperate with various professional communities and similar;
- organise art exhibitions and other events, such as conferences and projects related to art education;
- produce a variety of customer services for the public;
- communicate their activities to stakeholders and market their services to the target audience.

This privacy policy is a general description of the principles and practices related to data protection at the Finnish National Gallery. The individual privacy statements describe the

Finnish National Gallery personal data files and their contents in more detail. For enquiries concerning privacy statements, contact the Finnish National Gallery registry at kirjaamo@kansallisgalleria.fi.

There are a number of specific provisions in EU and national legislation pertaining to the data protection of cultural heritage materials that aim to safeguard the freedom of research, information, art, and communications. For this reason, there are exceptions related to the processing of personal data, and, for example, the rights of the data subjects do not extend to cultural heritage materials.

Purpose of and legal grounds for processing personal data

In their activities, the Finnish National Gallery and its museums maintain close contacts with visual art professionals, other stakeholders, and their audience. The museums serve their audience and other stakeholders by providing information on exhibitions, research materials, events, other activities, and services. All this requires the processing of personal data, and the creation and maintenance of personal data files. The personal data is also used for profiling purposes, so as to provide targeted information for different groups, such as "info packages" for teachers.

The processing of personal data at the Finnish National Gallery is founded on the EU General Data Protection Regulation 2016/679, passed on 27 April 2016, and the Finnish Personal Data Act 523/1999. Our starting point is respect for people's fundamental rights, the protection of privacy when processing personal data, transparency, legality, data minimisation, and the protection of the rights of the data subject.

The legal grounds for processing personal data are set out in article 6 of the EU General Data Protection Regulation. Personal data can be processed or incorporated into a personal data file by consent, agreement or statutory obligation. It may also be necessary in the public interest. This is the case, in particular, in the case of cultural heritage materials, as documents containing personal data add to the collections of a library or an archive, serving the public interest. Large sets of personal data are processed in accordance with article 6 of the data protection regulation, based on the legitimate interest of the Finnish National Gallery or people associated with its operations. This means that there is a customer relationship or other significant relationship between the museum and the data subject, which justifies the processing of personal data to enable communication between the parties. The Finnish National Gallery deems it important to spread information about its operations to artists, partners and customers, and to serve research in the visual arts. The appropriate exchange of information and contacts between the above-mentioned groups is important for the operations of the Finnish National Gallery and its museums.

In addition to the EU data protection regulation, the Finnish Personal Data Act provides for the grounds for processing personal data. In all cases, the Finnish National Gallery deems it important that the processing of personal data and the purpose of processing are made clear. Only necessary personal data is processed and compiled into a personal data file, which will only be retained for as long as required for the purpose.

What data is collected

In carrying out the tasks mentioned above, the Finnish National Gallery collects, for example, the following kinds of personal data:

1. Data that people provide to the Finnish National Gallery:
 - Name or pseudonym
 - E-mail address and other contact details
 - Other descriptive data on the user, such as date of birth
 - Permissions, consents, and data on language choices or other similar choices
 - Interests, favourites, and topic preferences
 - Data from surveys and similar
 - Customer feedback
 - Other data provided or disclosed; for example, data collected from external sources.

2. Data detected and obtained on the use of services:
 - Data collected by the analytics systems of online services (see the Finnish National Gallery cookie policy)
 - Data from customer communications, including clicks on links
 - The website from which the user came to the Finnish National Gallery website
 - Device identifiers, such as the terminal device model and the unique device and/or cookie identifier
 - Data collection channel: internet browser, mobile browser, application, and browser version
 - IP address
 - Operating system of the terminal device
 - Session identifier, session time and duration
 - Location data
 - Data linked to a user, based on the user's history of using the Finnish National Gallery services and obtained from detected use and/or from data provided by the user, such as demographics, interests, and other groupings of users.

3. The Finnish National Gallery collects extensive data material on art history and phenomena in art, which also includes personal data. These data may also include data pertaining to specific categories of people.

If you do not accept the practices described in this privacy policy and [the Finnish National Gallery cookie policy](#), we do not recommend that you disclose your personal data. In this case, you can exercise your right to request that your data be rectified or erased.

How personal data is collected

Data is provided by the data subject, obtained and collected in planning and implementing operations, stored during the documentation process, and acquired from various public sources.

Cultural heritage material, including personal data, also accumulates through research and various archive donations. Art-historical and other research material does not contain restrictions in terms of data content.

How personal data is stored

We use appropriate physical, technical and administrative means to protect personal data against misuse. Data is stored on secure servers, which are accessible only to designated persons. Access to systems containing personal data is restricted and need-based.

The Finnish National Gallery below has valid cooperation agreements with partners in accordance with the EU data protection regulation. This ensures secure and appropriate use of personal data even in those situations in which partners have access to personal data, including website visitor analytics.

The Finnish National Gallery stores personal data in accordance with existing legislation and only for as long as is necessary to fulfil the purposes that have been defined in this privacy policy. Once the purpose for which personal data is processed ceases, the personal data is erased.

The EU data protection regulation includes restrictions on the data subjects' rights when personal data is processed for archiving purposes in the public interest. This applies to the cultural heritage materials held by the Finnish National Gallery. For example, there is no right to inspect art-historical and cultural-historical research materials. This means that data subjects cannot have the personal data contained in these materials rectified, erased or restricted. For the most part, cultural heritage materials fall outside the scope of data protection, because the EU data protection regulation does not apply to deceased persons.

Documentation created in conjunction with exhibition activities can be included as part of cultural heritage material.

Disclosure of personal data

As a rule, personal data is not disclosed outside the Finnish National Gallery. The exception are images that are used for journalistic and/or other purposes mentioned in the EU data protection regulation, and disclosures laid down by law.

Cultural heritage materials, such as art-historical and cultural-historical materials, are available for use by researchers and other people who require them. For the most part, they fall outside the scope of data protection because the EU data protection regulation does not apply to deceased persons.

Right to inspect and rectify personal data

Anyone has the legal right to inspect the data collected on them. People also have the right to request that incorrect, incomplete, unnecessary or outdated personal data be rectified or erased.

The request to inspect personal data can be made in person, using a separate form available at the customer service desks of the Finnish National Gallery museums (the Ateneum Art Museum, the Museum of Contemporary Art Kiasma, and the Sinebrychoff Art Museum). For identification purposes, a valid identity document (a passport, an identity card, or a driving licence) must be presented.

The request to inspect personal data can be made by filling in the Request to inspect personal data form and sending it by post to the Finnish National Gallery, Registry, Kaivokatu 2, 00100 Helsinki, or by email to kirjaamo@kansallisgalleria.fi. For identification purposes, attach a copy of a valid identity document (a passport, an identity card, or a driving licence).

The EU data protection regulation includes restrictions on the data subjects' rights when personal data is processed for archiving purposes in the public interest. This applies to the cultural heritage materials held by the Finnish National Gallery. There is no right to inspect art-historical and cultural-historical research materials. This means that data subjects cannot have the personal data contained in these materials rectified, erased or restricted. For the most part, cultural heritage materials fall outside the scope of data protection because the EU data protection regulation does not apply to deceased persons.

Anyone has the right to prohibit the Finnish National Gallery from processing their data for the purposes of direct marketing, customer satisfaction surveys and similar. The Finnish National Gallery can, however, continue sending notifications related to their services, including on changes or faults in the services.

Amendments to this privacy policy

The Finnish National Gallery is continuously developing its operations. Periodic amendments to this privacy policy are possible. Such changes may be made without prior notice. The changes can also be related to changes in legislation. Updates to the legislation are noted at the beginning of this privacy policy.

Controller and contact details

The controller is the Finnish National Gallery, Kaivokatu 2, 00100 Helsinki.

In issues related to the protection of privacy and personal data, contact us by email at kirjaamo@kansallisgalleria.fi.