



PRIVACY STATEMENT

1 (3)

Article 12 of the General Data Protection Regulation (679/2016)

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1 Name of register	Finnish Transparency Register
2 Data controller	National Audit Office of Finland (NAOF) Porkkalankatu 1 FI-00101 Helsinki +358 (0)9 4321 kirjaamo@vtv.fi
3 Contact person for register-related matters	Jonna Carlson National Audit Office of Finland (NAOF) Porkkalankatu 1 FI-00101 Helsinki +358 (0)9 4325897 jonna.carlson(at)vtv.fi
4 Data Protection Officer	Data Protection Officer Mari Tölli National Audit Office of Finland (NAOF) Porkkalankatu 1 FI-00101 Helsinki tietosuojavastaava@vtv.fi
5 Purpose of personal data processing	The National Audit Office's right to process personal data is based on the Transparency Register Act (23.3.2023/430). The data is processed in the manner laid down by the data protection legislation. No profiling or decisions based on automated decision-making are made on the basis of the personal data collected. Only the personal data laid down in the Transparency Register Act is stored in the register.
6 Data contained in the register	The data entered in the Finnish Transparency Register includes the registrations, disclosures of activities, changes to the registration and changes to the activities submitted by a legal person or a private entrepreneur engaged in lobbying or lobbying consultancy (<i>actor subject to the disclosure obligation</i>), as well as the parties to a penalty payment procedure or request for clarification. The content of a registration is provided for in section 6 of the Transparency Register Act, the content of a disclosure of activities in section 8 of the Act, and the content of a change notification in section 7 of the Act. The penalty payment procedure is provided for in section 9(3) of the Act, and requests for clarification are provided for in section 10 of the Act. The data referred to in section 6 and disclosed to the Finnish Transparency Register is published on the public information network. It is also available in machine-readable format through open interfaces. The personal data concerning parties subject to the disclosure obligation stored in the Finnish Transparency Register consist of the name and personal identity code of the person submitting the disclosure. On a voluntary basis, an e-mail address to which system messages can be sent and a telephone number can be provided for the register. The personal data are collected for the purposes of the registrar's oversight and maintenance activities, and they are not published in a public information network. The personal identity codes are protected separately. For customers of lobbying consultancy, e-mail addresses and/or telephone numbers are collected as contact information. The information is collected for the purposes of the registrar's oversight and maintenance activities, and it is not published in a public information network.

	For lobbying targets, their workplaces, job titles and names are stored in the Finnish Transparency Register, as well as their e-mail addresses as contact information. The workplaces, job titles and names are published in a public information network at avoimuusrekisteri.fi , and they are also available through open interfaces. The e-mail addresses are only used to inform the lobbying targets, and they are not published on a public information network.
7 Regular data sources	Legal persons and private entrepreneurs referred to in section 3 of the Transparency Register Act that are engaged in lobbying or lobbying consultancy and that are subject to the disclosure obligation.
8 Data recipients	Access to non-public data entered in the Finnish Transparency Register is restricted only to the officials of the National Audit Office who need it for performing their tasks and, where appropriate, to experts designated by the National Audit Office. If necessary, the system vendor HiQ Public Oy is granted separately access to the data.
9 Transfer of data outside the EU or the EEA	Personal data is not transferred outside the EU/EEA area.
10 Register protection principles	<p>The register is handled with due care, and the data processed by means of information systems is protected appropriately. The controller ensures that the stored data is processed confidentially.</p> <p>Access to the data processed in the information system is restricted to persons specifically designated and authorised by the controller. It is checked regularly that the access rights are up to date.</p> <p>The information network and the terminal equipment where the register is located are protected by technical measures.</p>
11 Right to access, rectify, erase and restrict the processing of data and to withdraw consent	<p>The rectification of personal data is provided for in Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). In addition, provisions on the correctness of public authorities' data are also laid down in the Act on Information Management Governance in Public Administration (906/2019).</p> <p>The General Data Protection Regulation (2016/679) and the Data Protection Act (5.12.2018/1050) apply to the right of a person to erase or restrict the processing of their personal data and to withdraw their consent.</p> <p>The data subject can submit a request related to personal data in the register to the National Audit Office's Registry. When making the request, the data subject must provide proof of their identity.</p>
12 The right to lodge a complaint with a supervisory authority	<p>A data subject has the right to lodge a complaint with the supervisory authority if the processing of their personal data violates applicable data protection legislation. The national supervisory authority in Finland is the Office of the Data Protection Ombudsman, contact information:</p> <p>Office of the Data Protection Ombudsman Visiting address: Lintulahdenkuja 4 FI-00530 Helsinki</p> <p>Postal address: P. O. Box 800 FI-00531 Helsinki</p> <p>Tel. (switchboard): + 358 (0)29 56 66700 Email: tietosuoja@om.fi</p>

13 Other information	<p>Personal data is not used or disclosed for direct advertising, distance selling or other direct marketing or for market research and opinion polling or for public registers or genealogical research.</p> <p>Any detected risks or problems related to data protection can be reported to the National Audit Office by email: kirjaamo@vtv.fi</p>
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