



The EU General Data Protection Regulation, Article 14

Communication on the collection and storage of your personal data in the Finnish Transparency Register

This is a communication in accordance with Article 14 of the EU General Data Protection Regulation (GDPR) on the collection and storage of your personal data in the Finnish Transparency Register. This communication does not require any action from you. The Finnish Transparency Register is a register established by the National Audit Office of Finland under the Finnish Transparency Register Act (430/2023). The information stored in the Register relates to long-term and professional lobbying or lobbying consultancy that targets Parliament or the ministries.

Lobbying refers to communicating with a lobbying target on one's own account with the aim of influencing the preparation and decision-making in a matter by promoting a certain interest or objective. Lobbying consultancy refers to such professional activities where lobbying is carried out on behalf of a client or where a client is provided with support in lobbying. (Finnish Transparency Register Act (430/2023), section 2)

According to section 2 of the Finnish Transparency Register Act (430/2023), you are a lobbying target to be disclosed to the Register. Lobbying targets include:

1. Members of Parliament, parliamentary assistants and the staff of parliamentary groups
2. ministers, special advisers to ministers and state secretaries appointed for ministers' term of office
3. Parliamentary Office
4. ministries and rapporteurs appointed by them.

The collection of your personal data is based on section 8(4) of the Finnish Transparency Register Act (430/2023). According to it, lobbying targets shall be specified in the disclosure of activities in such a manner that the person is named in the case of:

- Members of Parliament
- ministers
- state secretaries and special advisers appointed for Ministers' term of office
- the Secretary-General and Deputy Secretary-General of Parliament
- permanent secretaries, permanent under-secretaries and directors-general of ministries
- rapporteurs appointed by ministries.

The name of the parliamentary group is given for the parliamentary assistants and the staff of the parliamentary groups.

The name of the department and unit is given for communication with other public officials of the ministries.

As for communication with other public officials of the Prime Minister's Office, information is given on the committee, department and unit or other corresponding part of the organisation.

<p>Below is a list of the information in accordance with Article 14 of the EU GDPR on the Transparency Register and on the processing of the personal data collected and stored for it.</p> <p style="text-align: center;">The EU General Data Protection Regulation, Article 14</p> <p style="text-align: center;">Information to be provided where personal data have not been obtained from the data subject</p>		
Paragraph 1		
(a)	the controller's (i.e. the registrar's) contact information	National Audit Office of Finland (NAOF) Porkkalankatu 1 FI-00101 Helsinki, tel. +358 (0)9 4321 kirjaamo@vtv.fi
(b)	the contact details of the data protection officer	Mari Tölli National Audit Office of Finland (NAOF) Porkkalankatu 1 FI-00101 Helsinki tel. +358 (0)50 532 9719 tietosuojavastaava@vtv.fi
(c)	the purposes of the processing for which the personal data are intended as well as the legal basis for the processing	The purpose of processing the personal data is to maintain a transparency register as referred to in the Finnish Transparency Register Act (430/2023). The right of the National Audit Office to process personal data is based on the Finnish Transparency Register Act (430/2023) and points (c) and (e) of paragraph 1 of Article 6 of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation).
(d)	the categories of personal data concerned	The data stored on lobbying targets in the Finnish Transparency Register include the workplace, title and name as well as the email address as contact information.
(e)	the recipients or categories of recipients of the personal data	The workplaces, titles and names of lobbying targets are published on the public information network at avoimuusrekisteri.fi . The email addresses are used only for sending this communication in accordance with the GDPR or other significant information to the lobbying targets, and they are only processed by the officials of the National Audit Office who need them to perform their duties.
(f)	transfer of personal data	The workplaces, titles and names of lobbying targets are published on the public information network at avoimuusrekisteri.fi . Information on the email addresses of lobbying targets is not transferred outside Finland.
Paragraph 2		
(a)	the period for which the personal data will be stored	The workplaces, titles and names of lobbying targets are data that will be stored permanently. They will be available on the public information network at avoimuusrekisteri.fi for a period of 10 years starting from the submission of the disclosure. After that, they will be archived. Email addresses will be stored as long as the person continues to be a lobbying target to be named under the Finnish Transparency Register Act.

(b)	–	–
(c)	the existence of the right to request from the controller access to personal data	The data subject has the right to access the data recorded on them in the Register. To access the personal data recorded in the Register, the data subject must submit a request to the National Audit Office's registry. When making the request, the data subject must provide proof of their identity.
	the right to request rectification of personal data	The data subject has the right to request rectification of erroneous personal data on them. In order to have their personal data rectified, the data subject must submit a request for rectification to the National Audit Office's registry. When making the request, the data subject must provide proof of their identity.
	the right to request erasure of personal data	<p>The data subject has the right to request erasure of their personal data if the request for erasure is based on the following:</p> <ul style="list-style-type: none"> - the processing is not necessary in order for the competent authority to perform its statutory task - the data are processed contrary to their purpose - the data that are processed are neither appropriate nor necessary for the purpose of their processing - the data that are processed are not accurate and updated taking into account the purpose of the processing - specific categories of personal data are processed contrary to the conditions for their processing. <p>The data subject can submit a request for erasure of their personal data stored in the Register to the National Audit Office's registry. When making the request, the data subject must provide proof of their identity.</p>
	the right to request restriction of the processing of personal data	<p>The data subject has the right to demand that the controller restrict the processing of data if</p> <ul style="list-style-type: none"> - the data subject disputes the accuracy of the personal data - the processing is contrary to law, and the data subject objects to the erasure of their personal data and demands instead that their use be restricted - the controller no longer needs the personal data in question for the purposes of the processing, but the data subject needs them in order to prepare, present or defend a legal claim.

		To restrict the processing of personal data stored in the Register, the data subject must submit a request to the National Audit Office's registry. When making the request, the data subject must provide proof of their identity.
(d)	–	–
(e)	the right to lodge a complaint with a supervisory authority	<p>The data subject has the right to lodge a complaint with the supervisory authority if the processing of their personal data infringes 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 Postal address: P. O. Box 800 FI-00531 Helsinki Tel. (switchboard): + 358 (0)29 56 66700 Email: tietosuoja@om.fi</p>
(f)	from which source the personal data originate	<p>The workplaces, titles and names of lobbying targets have been collected through requests for information from the ministries and Parliament and, if necessary, from the public information network. The email addresses of those working in ministries are formed automatically from the name and the gov.fi suffix. The National Audit Office receives the email addresses of those working in Parliament from the internal directory.</p>
(g)	the existence of automated decision-making	No profiling or decisions based on automated decision-making are made on the basis of the personal data collected.

DISTRIBUTION Lobbying targets defined in the Finnish Transparency Register Act