



Privacy Statement

EU General Data Protection Regulation (679/2016), Article 12

Drawn up on 13 April 2026

1 Name of the 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 Toivoniemi National Audit Office of Finland (NAOF) Porkkalankatu 1 FI-00101 Helsinki +358 (0)9 4325897 jonna.toivoniemi(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	<p>The legal basis for the processing of personal data is laid down in the following provisions of the EU General Data Protection Regulation (2016/679):</p> <ul style="list-style-type: none">• Article 6 (1c), i.e. compliance with a legal obligation to which the controller is subject• Article 6 (1e), i.e. the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. <p>The National Audit Office of Finland acts as the controller referred to in the GDPR. Its statutory duties are based on section 9 of the Finnish Transparency Register Act (430/2023), according to which the National Audit Office is responsible for maintaining the Finnish Transparency Register, for overseeing compliance with the disclosure obligation, and for providing guidance and advice related to the Register. Personal data is processed in order to perform these statutory duties and to enable communication between the controller and the actors subject to the disclosure obligation.</p> <p>Personal data is processed in compliance with the data protection legislation and other general legislation governing the activities of public authorities. No profiling or decisions based on automated decision-making are made on the basis of the personal data collected.</p>

<p>6 Data content of the register</p>	<p>The data recorded in the Finnish Transparency Register includes registrations, disclosures of activities and deregistrations, and any changes to these, submitted by legal persons or private entrepreneurs engaged in lobbying or lobbying consultancy (<i>actors subject to the disclosure obligation</i>). The parties to a penalty payment procedure are also recorded in the Register.</p> <p>The content of a registration is provided for in section 6 of the Finnish 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, subsection 3 of the Act.</p> <p>Categories of personal data contained in the Finnish Transparency Register:</p> <ul style="list-style-type: none"> • Identification details (name and personal identity code) of the representative of a registered actor subject to the disclosure obligation • Contact details (email address, postal address and telephone number) of the actor subject to the disclosure obligation or the lobbying consultancy client • Identification details (organisation, department, unit, title, name and changes to the title) of the lobbying target. <p>The identification and contact details and information on changes of title are used only for maintaining the Register, and they are not published online. The content of the disclosures and the identification details of the lobbying target are otherwise published online.</p>
<p>7 Personal data retention period</p>	<p>Under the provisions of the Archives Act (831/1994) concerning the National Audit Office, archives consist of documents that have been received by the records creator in the course of its duties or that have been produced in connection with the activities of the records creator.</p> <p>The data and documents contained in the Finnish Transparency Register shall be retained permanently. Accordingly, the personal data contained in them are also retained permanently.</p>
<p>8 Regular sources of information</p>	<ul style="list-style-type: none"> • Actors subject to the disclosure obligation as referred to in section 3 of the Finnish Transparency Register Act • The ministries and Parliament (verifying the accuracy of the lobbying targets' identification details).
<p>9 Data recipients</p>	<p>The data specified in section 6 is, with the exceptions mentioned above, freely available on the website of the Finnish Transparency Register and via open interfaces. Other data is disclosed upon request in accordance with the Act on the Openness of Government Activities.</p> <p>Personal data is disclosed to the service provider that produces the Finnish Transparency Register service. The service provider processes personal data on behalf of the National Audit Office and may not process the data for any other purposes than those related to the provision of the service.</p> <p>Personal data is not 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>10 Transfer of data outside the EU or the EEA</p>	<p>Personal data is not transferred outside the EU/EEA area.</p>

<p>11 Register protection principles</p>	<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. The validity of access rights is reviewed regularly.</p> <p>The information network and the terminal equipment where the Register is located are protected by technical measures.</p>
<p>12 Right to access, rectify, erase and restrict the processing of data and to withdraw consent</p>	<p>The data subject has the right to access the data recorded on them in the Register. The data subject also has the right to request rectification of erroneous personal data on them. Requests can be submitted to the registry of the National Audit Office. When submitting a request, the requester must be prepared to verify their identity.</p> <p>The processing of personal data is based on compliance with a statutory obligation and the performance of a task carried out in the public interest. This means that the data subject may not request the erasure of their personal data or the transfer of their personal data to another system or, as a rule, object to or restrict the processing of their personal data.</p> <p>The data subject's rights in the processing of their personal data are governed by the EU General Data Protection Regulation and the Data Protection Act (2018/1050). In addition, provisions on the correctness of public authorities' data are also laid down in the Act on Information Management in Public Administration (906/2019).</p>
<p>13 Right to lodge a complaint with a supervisory authority</p>	<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 details:</p> <p>Office of the Data Protection Ombudsman Visiting address: Lintulahdenkuja 4 FI-00530 Helsinki, Finland Postal address: PO Box 800 FI-00531 Helsinki, Finland Tel. (switchboard): + 358 (0)29 56 66700 Email: tietosuoja@om.fi</p>
<p>14 Other information</p>	<p>Any detected risks or problems related to data protection can be reported to the National Audit Office by email: kirjaamo@vtv.fi You can use Parliament's secure messaging service to send confidential information.</p>