

Case number TRAFICOM/205069/00.02.08/2025

# **Transport matters in My e-Services**

### 1.1 Controller

Finnish Transport and Communications Agency (Traficom)

#### **Controller's contact details**

PO Box 320, FI-00059 TRAFICOM kirjaamo@traficom.fi telephone +358 (0)29 534 5000

## Contact details of the controller's data protection officer

PO Box 320, FI-00059 TRAFICOM tietosuoja@traficom.fi telephone +358 (0)29 534 5000

If your message contains confidential, secret or otherwise sensitive content or a personal identity code, please use Traficom's secure email. Instructions for sending secure e-mail: <a href="https://www.traficom.fi/en/traficom/contact-de-tails/sending-secure-email-traficom">https://www.traficom.fi/en/traficom/contact-de-tails/sending-secure-email-traficom</a>

## 1.2 Grounds for and purpose of the data processing

According to section 5 of the Act on the Provision of Digital Services (306/2019), Traficom has the duty to offer everyone the opportunity to submit electronic messages and documents related to their matters with the help of digital services or other electronic transmission methods. The purpose of offering transport matters in My e-Services is to fulfil the statutory duty to offer digital services mentioned above.

The My e-Services service is a portal that offers a uniform service concept and support services for digital transport-related services. The portal contains information on your vehicles, boats and driving license and also offers you the option to create certificates in connection with sales or make changes to the instalments of your vehicle tax.

The content of services used in My e-Services is based on service specific regulations, such as the Act on Transport Services (320/2017), the Vehicles Act (1090/2002), the government decree on registering vehicles (valtioneuvoston asetus ajoneuvojen rekisteröinnistä) (893/2007), the Water Traffic Act (782/2019) and the act on vehicle tax (ajoneuvoverolaki) (1281/2003).



You can use My e-Services as a private individual or a representative of an organisation after identification. Identification is based on subsection 1 of section 6 of the Act on the Provision of Digital Services (306/2019). Traficom requires that customers are identified, because the service allows customers to view their own details and perform legal acts in the matters of a personal customer or on behalf of an organisation. Identification is also required for public individual requests to fulfil the requirement concerning the nature of individual data transfer requests and to prevent misuse of the service.

Log data is collected on the use of My e-Services in accordance with section 17 of the Act on Information Management in Public Administration (906/2019) to monitor the use and transfer of data in the information systems as well as to investigate technical errors in the information system.

The legal basis for the processing of personal data in connection with My e-Services is Article 6(1)(c) of the General Data Protection Regulation, i.e. compliance with a legal obligation. In addition to this, My e-Services utilises Suomi.fi services produced by the Digital and Population Data Services Agency (DVV) and the State Treasury in accordance with section 5 of the act on support services for shared government electronic services (laki hallinnon yhteisistä sähköisen asioinnin tukipalveluista (571/2016)). The State Treasury produces the Suomi.fi Payments online payment service. Further information on the service is available on <a href="the StateTreasury website">the StateTreasury website</a> and the <a href="DVV website">DVV website</a> (in Finnish). DVV produces the Suomi.fi e-Identification, Suomi.fi e-Authorisations and Suomi.fi Messages services. You can find further information on these services on the <a href="DVV website">DVV website</a> and Privacy statement 3 June 2021 version 1.0 2 <a href="Suomi.fi">Suomi.fi</a> website. Privacy statements concerning Suomi.fi services produced by DVV are available on the Suomi.fi website.

#### 2 Data content

### 2.1 Register data

When identifying with My e-Services through the Suomi.fi e-Identification service maintained by DVV, the system will process the personal identity code transferred with the other data to My e-Services. When using the service on behalf of an organization, the system will also process data concerning the person's authorization to act on behalf of the organization. When a foreign person uses the service on behalf of an organization using the Finnish Authenticator app, the system will process the person's foreigner's user identifier (UID), first and last names, date of birth and the authorization granted to the person to act on behalf of the organization. When



using the service with eIDAS identification, processed data includes the PID identifier, first and last name and date of birth.

The personal data to be processed are determined based on the service used by the customer. The following personal data will be processed in connection with using My e-Services, among others:

- Traficom customer number
- vehicle identifier, such as a vehicle or watercraft registration number
- vehicle owner and holder details and technical data
- driving rights
- digital certificate information
- vehicle tax data
- qualifications
- payment information
- invoicing information (only for entrepreneurs and organizations)
- contact information for the contact person of the entrepreneur or organization (first and last names, telephone number and e-mail)
- electronic messages (concerning e.g. vehicle taxation, driving licenses and watercraft)
- confirmation/receipt of service of events performed in the service information contained in the applications submitted by the customer through the system
- contact made by the customer through the service log data

The Your information section in My e-Services displays the customer's first and last names, address, language, vehicle tax customer number and electronic contact details.

The customer can also view their own valid non-disclosures of data and add or remove restrictions in My e-Services. The customer can report, update or remove their own electronic contact details (e-mail address and telephone number) and their language preference in the Your information section.

Those acting on behalf of an organisation may report, update and remove the contact details of the organisation's contact person in the Your information section of My e-Services. This may only be performed for organisations by someone authorised to maintain traffic operator data and permits or by someone authorised on the basis of their position.

My e-Services uses essential cookies in terms of administering the session of customers who have logged in in accordance with the technical functionality requirements of the service.



## 2.2 Data sources of the register (where data is received from)

Data is collected from natural persons using My e-Services (the data may be personal data entered by the person or personal data on the representative or contact person of an organization entered by them or data generated by the use of My e-Services, such as log data).

Traficom receives data concerning the Suomi.fi services maintained by DVV through DVV.

### 2.3 Retention period of personal data

Personal data processed individually in My e-Services are data from the Transport Register. The retention period of personal data is described in the Transport Register privacy statement (in Finnish).

Cookies used in My e-Services are stored in the customer's terminal device browser. Session cookies will be removed after the session ends. Other cookies will remain on the customer's terminal device until the customer removes them (or has set the browser settings to remove cookies) or logs in again to My e-Services, at which time cookies will be updated.

My e-Services log data is retained for up to the duration of the present year and the following seven years.

## 3 Data processing

### 3.1 Recipients and recipient groups of personal data (Disclosure)

Data processed in connection with My e-Services can only be disclosed in accordance with the obligations and restrictions set out in currently valid legislation. Paytrail Oyj (2122839-7), implementation of the payment gateway service and provision of the payment service. The customer shall pay the service fee at the time of the service event using the Suomi.fi Payments service, where they need to select their preferred payment option. Paytrail Oyj will redirect the customer to the payment option of their choice. After the payment is processed, the payment service will report the successful transaction to Paytrail Oyj, who will then report it to Traficom.

## 3.2 Processing of personal data on behalf of the controller

Government ICT Centre Valtori (Business ID: 2574261-7).



## 3.3 The transfer of personal data outside the EU

Traficom or its data processors or sub processors will not transfer personal data outside the EU/EEA.

My e-Services is browser-based and can be accessed from anywhere, if the user is able to identify with the service.

### 3.4 Automated decision-making and profiling

The data will not be used for profiling. The customer may perform actions that are recorded in the Transport Register maintained by Traficom in certain My eServices.

## 4 Rights of the data subject

### 4.1 Right to lodge a complaint with the supervisory authority

The data subject has the right to lodge a complaint with the Data Protection Ombudsman if the data subject believes that their personal data is being processed in violation of relevant legislation. This right does not restrict other administrative appeals or judicial remedies.

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## 4.2 Right to access personal data

The data subject has the right to receive from the controller confirmation as to whether or not personal data concerning them is being processed. If processing takes place, the data subject has the right to access their personal data. The access request must be directed at the controller. The controller's contact details are included in this privacy statement. Instructions for submitting an access request are available on <a href="Traficom's website">Traficom's website</a>. Some of the personal data processed in My e-Services are displayed to the customer in the Your information section.

## 4.3 Right to rectification

The data subject has the right to demand the controller to rectify inaccurate or incorrect personal data concerning them without undue delay. The rectification request should be addressed to the controller.



The data subject may update or remove the electronic contact details they themselves have submitted (telephone number, e-mail address) and update their preferred language in the Your information section of My e-Services.

Those acting on behalf of an organisation may update or remove the contact details of the contact person submitted by the organisation in the Your information section of My e-Services. This may only be performed for organisations by someone authorised to maintain traffic operator data and permits or by someone authorised on the basis of their position.

## 4.4 Right to object

The data subject has the right to object to their personal data being processed for direct marketing purposes. In addition to this, the data subject also has the right to prohibit the disclosure of their personal data through an open interface or for traffic-related purposes and development and innovation activities based on section 231 of the Act on Transport Services. In addition to this, natural persons have the right to prohibit the disclosure of their contact details as an individual release. Legal persons have the right to prohibit the disclosure of their data for development and innovation activities.

The customer can view their own valid non-disclosures of data and add or remove restrictions in My e-Services.

### 4.5 Right to data portability

This right does not apply to the processing operations in question since personal data is not processed on the basis of consent or agreement.

#### 4.6 Right to erasure

This right does not apply to the processing operations in question since the legal basis for the processing of personal data is compliance with a legal obligation.

Customers can, however, remove voluntarily reported electronic contact details (personal customers and representatives of organizations) in My e-Services.