

21.3.2024

Processing of personal data in the State Treasury's analysis and reporting services

1 Controller

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2 Contact person in register-related matters

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Matters relating to the rights of the data subject, Data Protection Officer:

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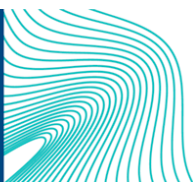
3 Legal basis and purpose for processing of the personal data

1. **Production of analysis and reporting services:** We process personal data as a part of our statutory analysis and reporting service tasks produced for the Government. Data from the central government's shared corporate service providers is utilised in the activities, including personnel data. This data is used to produce analysis and reporting services to support the Government's preparatory work and decision-making. Said data can also be utilised in research.

The lawfulness of the processing of the data is based on the controller's legal obligation in accordance with Article 6(1)(c) of the General Data Protection Regulation. Provisions on the analysis and reporting service task have been laid down in the Act on the State Treasury (305/1991, section 2, subsection 1, paragraph 5 and section 2 c).

2. **Maintenance of the customer register:** We store the names of the customer's contact persons in our customer register. The data will be used only for purposes related to implementing the assignment and maintaining the customer relationship. The customer gives their consent by submitting the assignment to the analysis services.

3. **Collection of customer feedback (feedback form):** The customer can provide their contact details on the feedback form. Providing the contact details is voluntary. The contact details provided by the customer are used only for responding to the feedback or for communicating about the further assignment requested by the customer. The customer gives their consent by writing their contact details on the feedback form.



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4 Personal data groups subject to processing

1. **Production of analysis and reporting services:** Data from the data registers of the producers of joint corporate services for government is utilised in the production of the analysis and reporting services. In addition, these registers also contain personal data of central government personnel as well as, in some cases, personal data on procurement suppliers. The processed data may be combined with other necessary and available data to the extent that the prerequisites of processing are met.

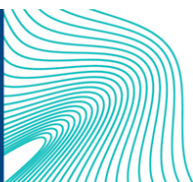
The analysis and reporting service activities do not involve processing the special categories of personal data referred to in article 9 of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of the European Union on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC. An exception to this is that information on the duration of absence caused by an illness, occupational disease or occupational accident may be processed if this is necessary for the performance of the task. This matter is separately provided for in the Act on the State Treasury (305/1991, section 2 c, subsection 2).

2. **Customer register:** The names of contact persons are stored in the customer register.
3. **Feedback form:** The customer can provide their name and e-mail address on the feedback form.

5 Regular data sources

Data from the central government's shared corporate service providers' data registers is utilised in the analysis and reporting service activities. The registers contain data on planning and monitoring of operations, financial and human resources management, common basic information technology, procurement management, facility management, centralised training services, project management and organisational structure related to Government agencies and institutions. The central government's shared corporate service providers include the Finnish Government Shared Services Centre for Finance and HR Palkeet, the Government ICT Centre Valtori, the Digital and Population Data Services Agency, Senate Properties, Hansel Oy, HAUS kehittämiskeskus Oy and the State Treasury.

The above-mentioned registers contain personal data of central government personnel and of suppliers related to procurement. Other data disclosed by the customer and other public information necessary for the implementation of the analysis and reporting service may also be used in the activities.



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6 Transfer or disclosure of personal data

As a rule, personal data is not disclosed outside the State Treasury. In assignments supporting employer activities, the final results of analyses can be processed at the personal level if the client has a statutory right to the processing of personal data.

At the State Treasury, the data is only processed by the officials or persons acting on behalf of the State Treasury who need it in their duties. Access to data systems is restricted by access rights. Personal data is processed by trained data analysts and data engineers, who have been subject to a security clearance.

7 Transfer and disclosure of data outside the EU or EEA

As a rule, the State Treasury does not transfer personal data outside the EEA. However, our processor (Microsoft Ireland Operations Limited) may transfer data that is being processed by it to its sub-processor (Microsoft Corporation). A limited amount of personal data may therefore be transferred to the United States in the data transfers between the processor and the sub-processor.

The grounds for the transfer are the model contract clauses approved by the European Commission.

8 Profiling and automatic decision-making

The State Treasury does not carry out automated decision-making or profiling of persons based on the personal data utilised in the analysis and reporting service activities.

9 Retention of personal data

Production of analysis and reporting services: Data is processed in compliance with the Act on the State Treasury and appropriate safeguards. Before transferring data for analysis, it is protected by pseudonymisation. The results of the analysis and reporting service activities are anonymised through aggregation or other methods in such a way that an individual cannot be identified unless the analysis or report is produced for a party who has the right to process the personal data disclosed.

As a rule, personal data is stored on the data platform only for the time and to the extent that is necessary for the assignments. Personal data will be stored for no longer than one year after the end of the assignment if no further requirements are identified on the same topic.

Customer register and feedback form: The personal data in the customer register and the feedback form is stored until the relationship between the controller and the customer can be considered to have ended. The ending time is determined on the basis of the end date of the assignment or the date on which the feedback was submitted, plus five years.



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10 Data subject rights in analysis and reporting services

The data subject has the right to ask the State Treasury for access to data concerning them and to request that the data be corrected.

As the processing of personal data is based on the performance of a statutory task under article 6(1)(c) of the GDPR, the data subject does not have the right to object to the processing of personal data under article 21 of the GDPR.

11 Right to lodge a complaint with a supervisory authority

As a data subject, you have the right to submit the legality of the State Treasury's activities for assessment by the Data Protection Ombudsman.

Contact information:

Office of the Data Protection Ombudsman

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