

## **1 The complaint on web accessibility and request for clarification form**

### **1.1 Controller**

Transport and Communications Agency (Traficom)

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

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

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

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

If your message contains confidential, secret or otherwise sensitive content or a personal identity code, please use Traficom's [secure email](#).

### **1.2 Grounds for and purpose of the data processing**

The Finnish Transport and Communications Agency Traficom serves as the supervisory authority referred to in the Act on the Provision of Digital Services (306/2019, hereinafter the Digital Services Act).

The Finnish Transport and Communications Agency Traficom handles personal data to process the complaints on web accessibility and requests for clarification laid down in section 11 of the Digital Services Act. The processing of personal data is necessary to comply with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation (EU) 2016/679).

The purpose of collecting personal data is to ensure the delivery of the necessary requests for supplementing information to secure the processing of complaints and requests for clarification. In addition, the purpose of collecting personal data is to ensure that the notification of not admitting the complaint for examination as referred to in section 53 b of the Administrative Procedure Act can be delivered to the person who submitted the complaint.

### **1.3 The data processed**

Under section 11 of the Digital Services Act, everyone has the right to submit a complaint on web accessibility or a request for clarification. The persons from whom personal data is collected do not form a specific uniform set or group.

The data collected from these persons are: name, email, street address, post code, town/city and telephone number. The nature of the information is contact details. The information is used to get in touch with the person, if necessary.

A complaint on web accessibility or a request for clarification can also be submitted anonymously.

#### **1.4 Sources of the processed data (where the data is received from)**

The personal data to be processed are collected from the person submitting the complaint on web accessibility or the request for clarification with the Complaint on web accessibility and request for clarification form, which is electronically available at [saavutettavuusvaatimukset.fi](https://saavutettavuusvaatimukset.fi).

#### **1.5 Storage period of personal data**

Personal data is stored according to provisions on storage periods in the Archives Act (831/1994), in Traficom's archive formation plan and in the regulations of the National Archives Service.

#### **1.6 Recipients and categories of recipients of personal data (who data is disclosed to)**

The data can be disclosed only within the limits permitted and obligated by legislation. Under section 1 of the Act on the Openness of Government Activities (621/1999), official documents are in the public domain unless specifically provided otherwise.

Under section 9 of the Act, everyone has the right of access to an official document in the public domain.

The complaints on web accessibility and requests for information received by Traficom are documents in the public domain to the extent that they do not contain the secret information referred to in section 24 of the Act on the Openness of Government Activities.

Based on a request for information, public documents containing personal data can be disclosed to a person who has submitted such a request.

#### **1.7 Processing of personal data on behalf of the controller**

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#### **1.8 Transfer of personal data to third countries outside the EU/EEA**

Personal data are not transferred to third countries outside the EU/EEA.

## **1.9 Automatic decision-making and profiling**

The processing of personal data does not include automated decision-making or profiling.

## **2 Rights related to the processing of personal data**

### **2.1 About exercising rights**

You can exercise your rights by submitting a request about it to Traficom by email or by post. The contact details can be found in this Privacy statement under the section "Controller's contact details"

### **2.2 The right to lodge a complaint with the supervisory authority**

If you consider the processing of your personal data to be in violation of legislation, you may submit a complaint about it to the Office of the Data Protection Ombudsman.

Office of the Data Protection Ombudsman  
PO Box 800, 00531 Helsinki, Finland  
tietosuoja(at)om.fi  
tel. +358 29 566 6700

### **2.3 Right to access one's own data**

The data subject has the right to receive from the controller a confirmation that personal data on the data subject are processed or are not processed and, if these personal data are processed, the right to access the personal data.

### **2.4 Right to rectification of data**

The data subject has the right to demand that the controller rectify any inaccurate and incorrect personal data on the data subject without undue delay.

### **2.5 Right to object**

In situations where the processing of personal data is based on a public interest, the exercise of public authority vested on the controller or the controller's or a third party's legitimate interest, the data subject has the right to object to the processing of their personal data.

If the data subject exercises their right to object, the controller must end the processing of the personal data, unless the controller can demonstrate that there is an important and justified reason for the processing that overrides the rights and freedoms of the data subject or if the processing is required to establish, present or defend a legal claim.

The data subject has the right to object to the processing without separate justifications if the data are processed for the purposes of direct marketing.

In a situation where the data are processed for statistical or research purposes, the data subject can object to the processing of the data on grounds relating to their particular situation, in which

case the controller must end the processing unless the processing is necessary for the performance of a task carried out in the public interest.

## **2.6 Right to restriction of processing**

The data subject has the right to have the processing by the controller restricted if:

- the data subject denies the accuracy of the personal data;
- the processing of the personal data is unlawful, but the data subject objects to the deletion of the personal data and demands that their use be restricted instead;
- the controller no longer needs the personal data concerned for the purposes of the processing, but the data subject needs them to establish, present or defend a legal claim;
- the data subject has objected to the processing of the personal data while waiting for the verification of whether the controller's legitimate grounds override the data subject's grounds.

## **2.7 Right to data portability**

The data subject has the right to receive the personal data concerning them that they have submitted to the controller in a structured, commonly used and machine-readable format and they also have the right to transmit this data to another controller without hindrance from the controller to which the personal data was submitted, provided that the processing of personal data is based on consent or agreement and the processing is carried out automatically.

## **2.8 Right to erasure of data**

In situations where the processing of personal data is based on a legal basis other than compliance with a statutory obligation, the data subject has the right to request the erasure of their personal data. The requested data are erased if the controller does not have a legal basis to refuse the erasure of the data, such as a statutory obligation to store the data.

## **2.9 Right to withdraw consent**

To the extent that personal data is processed on the basis of consent from the data subject, the data subject may withdraw their consent at any time by informing the controller about it. The withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before the withdrawal.