

Privacy statement for Finnvera's online service

Updated on 26 May 2023

1. General

This privacy statement provides information to the controller's customer required by the EU General Data Protection Regulation and Finnish legislation.

2. Controller

Finnvera plc (Business ID: 1484332-4)
Street address: Porkkalankatu 1, 00180 Helsinki, Finland
Switchboard: +358 (0)29 460 11

3. Contact information

Contact: tietosuojaavastaava@finnvera.fi

4. Register name

Finnvera's online services

5. What personal data we process

The following personal data categories and related personal data are relevant to customers:

- Basic information: Information for specifying persons acting on behalf of an organisation and information about their relation to the organisation in question (based on register-based mandates in the Suomi.fi authorisation service)
- Customer relationship information: Information for specifying and categorising the customer relationship, such as the length and nature of the customer relationship
- Information related to statutory requirements: Information needed for identifying the customer and determining the financial position and political power. Data to be stored include the name and the personal identity code, among other things (information received via the Suomi.fi identification service).
- Contact information: Telephone numbers, address details and e-mail address (information received from the customer in the case of individual customers)
- Financial information: Agreement information, such as the agreement type and transaction information.

6. Legal basis for the processing of personal data

We process your personal data to fulfil our legal and contractual obligations, to be able to make offers to you and to provide you with advice and services.

The legal basis of the processing according to the Article 6 of the General Data Protection Regulation:

- conclusion and performance of a contract to which the data subject is party
- compliance with a legal obligation to which the controller is subject.

7. Regular sources of data

Personal data is mainly collected from data subjects themselves. In addition, personal data is collected, to the extent permitted by law, from the following:

- Registers maintained by the authorities (Digital and Population Data Services Agency, business registers)

8. Regular disclosure of data and groups of recipients

Data is not regularly disclosed.

9. Transfer of data outside the EU or the EEA

No regular transfer of data to countries outside the EU or the European Economic Area.

We use subcontractors and partners to produce and provide services, which is why your personal data may be transferred to such parties for processing on our behalf. These parties will only be able to process your data in accordance with our instructions and they will not have access to your data for their own purposes, such as direct marketing.

We will ensure through contractual and other arrangements that our subcontractors and partners always process your data carefully and in accordance with good data processing practices.

As a rule, we process your data within the EEA. The EEA includes the EU Member States as well as Iceland, Liechtenstein and Norway. If we transfer data outside the EEA to a country whose national regulations do not guarantee EU-level data protection, we will ensure an adequate level of protection of personal data as required by law and use the data transfer mechanisms approved by the European Commission, primarily the standard contractual clauses of the European Commission.

The standard contractual clauses are available on the website of the European Commission:

[Standard contractual clauses for international transfers | European Commission \(europa.eu\)](https://european-council.europa.eu/media/1000000/1/6/Standard_contractual_clauses_for_international_transfers.pdf)

10. Principles of register protection

Your personal data is only processed by those Finnvera employees whose work duties require them to process the data. The access rights of the register are restricted with personal user IDs and passwords.

The controller's personnel are committed to complying with confidentiality obligations. In addition, the employees have committed to complying with internal information security guidelines.

We use appropriate technical and organisational safeguards to protect your personal data. Such means include proactive and reactive risk management, various protection and

filtration techniques as well as access control and safety systems. Safeguards also include security planning, controlled granting and monitoring of access rights, ensuring the competence of personnel involved in the processing of personal data, and careful selection of subcontractors. We update our internal practices and guidelines continuously.

The purpose of the aforementioned measures is to secure the confidentiality of the personal data stored in the register, the availability and integrity of data as well as the realisation of the rights of the data subjects.

11. Automated decision-making

Finnvera does not make decisions based on automated decision-making. Finnvera also does not conduct profiling based on the personal data it processes.

12. Your rights

You have the legal right to access data, the right to rectify data, the right to request the erasure of data i.e. “right to be forgotten”, the right to restriction of processing, the right to object to processing, and the right to have data transferred from one system to another (data portability).

Right of access

If you want to check your data, you have to submit an access request with the Messages function in the e-services under Other. (You can log in to the e-service with your personal banking IDs or a mobile ID).

Right to rectification

If your personal data in our possession is inaccurate or incomplete, you have the right to request the rectification of such data, unless this right is restricted by law.

Right to erasure

You have the right to the erasure of data in certain cases, but due to legislation, we have a statutory obligation to store your personal data for the entire duration of the customer relationship and even after it has ended.

Right to object to the processing of personal data

If you find that the data we have stored about you is incorrect or if you have objected to the use of the data, you may request that the use of your personal data be restricted so that we only have the right to retain your data until the accuracy of the data can be verified or until it can be verified whether our legitimate interests override your interests.

If you have the right to have your personal data in our possession deleted, you can ask us to restrict the processing of the data to its retention instead of deleting it. If we only need the data to defend a legal claim, you can also request that other use of the data be limited to its retention. However, we may have the right to use the data for other purposes, such as defending a legal claim, or in the case that you have given your consent for using the data for other purposes.

Right to withdraw consent

You have the right to withdraw your consent at any time without it affecting the legality of the processing carried out before the withdrawal of consent if the processing is based on your consent or express consent.

Complaint to the supervisory authority

You have the right to file a complaint or contact the Office of the Data Protection Ombudsman. The contact information is available on the Office's website.

13. Contact information

In all matters concerning the processing of personal data and the exercise of your rights, you can contact the Finnvera Data Protection Officer at tietosuojavastaava@finnvera.fi.

If you want to check your data, you have to submit an access request with the Messages function in the e-services under Other. (You can log in to the e-service with your personal banking IDs or a mobile ID).