

## NATIONAL PERSONAL TRANSPORT SURVEY 2025

<p><b>Data Controller Acting as the Contact Point for Data Subjects</b></p> <p>Finnish Transport and Communications Agency (Traficom)</p> <p><b>Joint Data Controllers During the Data Collection Phase of the Survey</b></p> <p>In addition to Traficom, the following parties act as joint data controllers during the data collection phase of the survey:</p> <ul style="list-style-type: none"><li>▪ City of Jyväskylä</li><li>▪ City of Kuopio</li><li>▪ City of Oulu</li><li>▪ Päijät-Häme Regional Council</li><li>▪ City of Tampere</li><li>▪ Regional Council of Southwest Finland</li></ul> <p>Traficom acts as the primary contact point for data subjects and is responsible for the implementation of data subjects' rights.</p>	<p><b>Contact Information for the Data Controller Acting as the Contact Point for Data Subjects</b></p> <p>PL 320, 00059 TRAFICOM kirjaamo@traficom.fi phone 029 534 5000</p> <p><b>Contact Information for the Data Protection Officer of the Data Controller Acting as the Contact Point for Data Subjects</b></p> <p>PL 320, 00059 TRAFICOM tietosuosa@traficom.fi phone 029 534 5000</p> <p>If your message contains sensitive, confidential, or otherwise sensitive content or a personal identification number, please use Traficom's <a href="#">secure email</a>.</p>
<p><b>Basis and Purpose of Data Processing</b></p> <p>This privacy notice concerns the processing of personal data required for the research process of the national personal transport survey (implementation year 4/2025–3/2026). These personal data registers include the respondent register for the pilot study, the sample extraction from the population information system, the research data (research register), and the contact information register for the lottery/reward respondents. The data are processed to produce statistically reliable basic information necessary for the study of mobility.</p> <p>The processing of personal data registers for the survey is carried out jointly by Traficom and the other aforementioned parties. The joint data control lasts for the duration of the data collection phase and ends after the data collection when the research data (research register) is handed over to the parties involved in the joint data control, and they become independent data controllers of the research register.</p> <p><b>Basis for Data Processing</b></p> <p>For the respondent register of the pilot study, the sample extraction from the population information system, and the research register, the legal basis for the processing of personal data is the processing necessary for the performance of a task carried out in the public interest, as stipulated in the applicable national legislation to which the data controller is subject (General Data Protection Regulation, Article 6(1)(e)). For Traficom, the basis for processing is stipulated in the applicable national legislation (Act on the Finnish Transport and Communications Agency 935/2018, Section 2.2; Act on Transport Services 320/2017, Section 179.1).</p>	

Docket TRAFICOM/466948/00.04.00.03/2024

8.10.2024

The national personal transport survey is part of the statutory task of monitoring the transport system.

The basis for the processing of personal data by the aforementioned parties participating in the survey is stipulated in the applicable national legislation (Land Use and Building Act 132/1999, Sections 4, 19, 20, 28, 39; Act on Regional Development and Implementation of European Union Regional and Structural Policy 756/2021, Section 17; Act on Transport System and Highways 503/2005, Section 15 c). The national personal transport survey is a prerequisite for the implementation of statutory planning tasks, and the processing is necessary and proportionate for the performance of a task carried out in the public interest by the authority (Data Protection Act 1050/2018, Section 4.1, Paragraph 2).

The processing of personal data is necessary because ensuring the statistical representativeness of the results requires the extraction of the survey sample from the population information system (personal data register) to conduct the survey. The use of a sample based on the population information system is necessary to ensure that the results statistically reliably reflect the mobility of Finns. The survey results create a personal data register because it contains information that enables indirect identification of individuals in the form of coordinates. Basic information about the population's mobility is needed for transport planning, transport system and traffic modeling, transport service planning, and monitoring of transport policy.

For the contact information register for the lottery/reward respondents, the legal basis for the processing of personal data is the consent of the data subjects for the processing of personal data for one or more specific purposes (General Data Protection Regulation, Article 6(1)(a)). Providing contact information for the lottery or possible reward is voluntary, and individuals can request the removal of their information (withdrawal of consent). The collection of contact information is a prerequisite for delivering the lottery reward.

### **Purpose of Data Processing**

The personal transport survey investigates the general mobility of Finns (modes of transport, purposes of trips) and the background factors influencing the trips made (e.g., age group, gender, type of residential area). The data can also be used to examine the effects of transport service offerings and land use on mobility. The survey is an important background material for transport planning, development of transport services, and transport policy.

**Content of the Data**

Processed data sets	<p>Registered individuals and information about them (group/groups of registered individuals and related information or data group):</p> <ul style="list-style-type: none"><li>▪ Respondent register for the pilot study, respondents from the staff of the implementing organizations: individual's name, contact information (home address, phone number)</li><li>▪ Sample extraction from the population information system, group invited to participate in the survey: individual's first and last name, date of birth, year of birth, gender, home address (street address, postal address, municipality, coordinates), personal identification number, first names, last names, dates of birth, and genders of adults living in the same household as the sampled individual; if the target individual is under 15 years old, the name of the parent living in the same household; randomly assigned unique respondent identifier; the survey implementer (service provider acting as the processor of personal data) supplements the phone number from the phone number service</li><li>▪ Research data (research register), group of respondents to the survey: unique respondent identifier, age, gender, home location (coordinates, municipality), departure and destination locations of each trip made (coordinates, municipality), obstacles to mobility (general classification), annual income categories of the individual and household (accuracy of 10,000); other background information and other information about the trips made by the individual on the survey day; the research register can be supplemented with information that is not personal data (see the next section); the research register does not contain personal data that enables direct identification</li><li>▪ Contact information register for the lottery/reward respondents: name, contact information for delivering rewards and accounting purposes</li></ul> <p>The processed personal data do not include special categories of personal data, only ordinary personal data. Responding to the survey is voluntary. The research register does not contain other personal data that enables direct identification than the respondent identifier. The connection between respondent identifiers and actual individuals is removed after the data collection ends, when the sample data are destroyed.</p> <p>The sample data from the population information system are used to extract educational information, type of residential building information, and validity information of the driver's license for the entire sample from the registers of Statistics Finland based on the personal identification number. The combination of register data is done at Statistics Finland. Statistics Finland provides the data only in classified, anonymized form, so the data do not constitute a personal data register. The data are used for the survey's non-response analysis and modeling of expansion coefficients.</p>
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Sources of the Processed Data Sets	<p>Sources of the processed data sets by register:</p> <ul style="list-style-type: none"><li>▪ Respondent register for the pilot study: personal data are collected from the staff of the participating organizations</li><li>▪ Sample extraction from the population information system: the sample is extracted from the population information system maintained by the Digital and Population Data Services Agency; the survey implementer (service provider acting as the processor of personal data) creates a random unique respondent identifier; the survey implementer supplements the phone number from the phone number service</li><li>▪ Research register: the research register is formed based on the responses provided by the respondents; responses are given securely according to the survey methods by phone, online form, or letter; the research register can be supplemented with information that is not personal data (see below)</li><li>▪ Contact information register for the lottery/reward respondents: the contact information register is formed based on the responses provided by the respondents; responses are given securely according to the survey methods by phone, online form, or letter</li></ul> <p>Supplementing Data from the Traffic Affairs Register:</p> <p>As the data controller, Traficom may supplement the research register with data from the traffic affairs register for the performance of its statutory tasks (Act on Transport Services 320/2017, Section 216.3). Information about the vehicles available to the respondent (e.g., fuel type) can be linked to the research register based on the home address.</p> <p>Place and land use information (area data) are linked to the research register based on address information from spatial and area registers. Such information includes, for example, municipal groups, rural-urban classification, grid classification of the built environment, area divisions, trip length on the road network. Linking area information to the data does not require the combination of personal data registers. Area information is obtained from several sources: Statistics Finland (area divisions), Finnish Environment Institute (land use types and classifications), Finnish Transport Infrastructure Agency (road networks, Digiroad), and Nokia HERE service (trip length calculation).</p>
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Retention Period of Personal Data	<p>Retention period of personal data by register:</p> <ul style="list-style-type: none"><li>▪ Respondent register for the pilot study: personal data are deleted after the implementation and analysis of the pilot study</li><li>▪ Sample extraction from the population information system: data obtained from the population information system are not entered into the research register; data obtained from the population information system are deleted after the implementation of the non-response analysis and modeling of expansion coefficients; if the data are used to analyze the results in relation to occupational and workplace industry information, personal data are retained by the data controller until the analysis is completed at Statistics Finland</li><li>▪ Research register: data in the research register are retained indefinitely; the survey is a long-term monitoring study, and data from previous survey rounds are used in the analyses of subsequent survey rounds</li><li>▪ Contact information register for the lottery/reward respondents: contact information is deleted after the lottery is conducted and rewards are delivered; however, the contact information of the reward winners is deleted according to the requirements of the Accounting Act six years from the end of the year in which the financial year ended (Accounting Act 1336/1997, Chapter 2, Section 10)</li></ul>
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### Processing of Personal Data

Processing of personal data during the research process (during joint data control) by register:	<p>Processing of personal data during the research process (during joint data control) by register:</p> <ul style="list-style-type: none"> <li>▪ Respondent register for the pilot study: contact information of the respondents is used to reach individuals by letter or phone</li> <li>▪ Sample extraction from the population information system: data obtained from the population information system are used to reach individuals by letter and to determine the phone numbers of adults living in the same household as the sampled individual using the phone number service; phone number information is used to reach the respondent by phone; data obtained from the population information system are not entered into the research register; data obtained from the population information system (personal identification number) are used to combine personal data registers at Statistics Finland (education, type of residence, ownership of a driver's license, occupation, workplace industry), but Statistics Finland does not provide identifiable information for the use of the survey</li> <li>▪ Research register: the research register consists of the information provided by the respondents and the linked area information; data in the research register are processed to check the logical consistency of the data, locate address information, supplement area information, and analyze the survey results as general statistical data</li> <li>▪ Contact information register for the lottery/reward respondents: contact information is processed for delivering rewards</li> </ul>
Recipients and Recipient Groups of Personal Data	<p>During the research process and thus during joint data control, data from personal data registers are not disclosed to other parties except the service provider acting as the processor of personal data during the research process (Destia Oy and Taloustutkimus Oy). Thus, data from the respondent register for the pilot study, the sample extraction from the population information system, or the contact information register for the lottery/reward respondents are not disclosed to external parties, but the registers are under the control of the service provider throughout the survey. Data on the winners of the lottery/reward respondents recorded in the accounting register are disclosed to the tax authorities.</p> <p>Recipients and recipient groups of personal data in the research register:</p> <ul style="list-style-type: none"> <li>▪ During the research process and joint data control, the research register is under the control of the service provider, and personal data are not disclosed to external parties</li> <li>▪ After the research process and joint data control ends, and Traficom becomes an independent data controller: the research register consists mainly of information provided by the respondents, which is considered confidential information provided to the authority; respondent-specific data in the research register (including coordinates) are generally not disclosed to external parties; respondent-specific data in the research register may be</li> </ul>

	<p>disclosed for a justified and credible reason to the following entities: universities and higher education institutions, research institutes conducting university research, state and municipal authorities, service providers acting on behalf of the data controller; disclosure always requires a research plan and data permit</p> <p>Data from the research register may be disclosed in anonymized form (classified data that are not respondent-specific) to entities working in the transport sector, such as planners, experts, or researchers. Anonymized data do not contain personal data that enable direct or indirect identification.</p> <p>Statistical-level reports, tabulations, presentations, classified statistical cubes, and other similar materials are published from the research register, from which individual respondents cannot be identified. Published materials are freely available.</p>
<p><b>Processing of Personal Data by the Data Controller (After the Research Process and Joint Data Control Ends)</b></p>	<p>As the data controller, Traficom processes the research register for the performance of its statutory tasks. Such tasks include monitoring the state of the transport system and developing the transport forecast model.</p> <p>As independent data controllers, the aforementioned parties participating in the survey process the research register for the performance of their statutory tasks. Such tasks include planning tasks related to land use and developing regional transport forecast models.</p>
<p><b>Processing of Personal Data on Behalf of the Data Controller</b></p>	<p>During the research process and joint data control, Destia Oy and Taloustutkimus Oy act as processors of personal data on behalf of the data controller (the survey implementer, i.e., the service provider acting as the processor of personal data) until 30.6.2028. The survey implementer processes data from the respondent register for the pilot study, the sample extraction from the population information system, the research register, and the contact information register for the lottery/reward respondents.</p> <p>During the research process and joint data control, Statistics Finland also acts as a processor of personal data on behalf of the data controller according to separate assignments. Statistics Finland receives the personal identification numbers of the sample extraction for the extraction of educational information, type of residence information, and validity information of the driver's license. The combination of register data is done at Statistics Finland, and respondent-specific data are not linked to the research register. Statistics Finland receives the personal identification numbers of the respondents and the research register to extract occupational and workplace industry information for the respondents and analyze this information in relation to the mobility data in the research register. The combination and analysis of register data are done at Statistics Finland, and respondent-specific data are not linked to the research register.</p> <p>After the research process ends, and Traficom becomes an independent data controller, the research register may be processed in</p>

	<p>Traficom's service provider assignments for the performance of Traficom's statutory tasks. Assignments may relate to promoting sustainable modes of transport, monitoring the state of the transport system and analyzing background factors of mobility, modeling mobility and traffic, and national and regional transport system planning. In service provider assignments, it must be ensured on a case-by-case basis that respondent-specific data are processed only for a justified reason, only for the purposes mentioned in this notice, and only to the extent necessary.</p> <p>After the research process ends, and the aforementioned parties participating in the survey become independent data controllers, the research register may be processed in the service provider assignments of the parties for the performance of their statutory tasks. Assignments may relate to land use planning, promoting sustainable modes of transport, analyzing background factors of mobility, and modeling mobility and traffic. In service provider assignments, it must be ensured on a case-by-case basis that respondent-specific data are processed only for a justified reason, only for the purposes mentioned in this notice, and only to the extent necessary.</p>
Transfer of Personal Data to Third Countries Outside the EU/EEA	The data controller or joint data controllers do not transfer personal data outside the EU or EEA.
Automated Decision-Making and Profiling	Automated decision-making or profiling is not conducted in the personal transport survey.

**Rights Related to the Processing of Personal Data****Exercising Rights**

You can exercise your rights by submitting a request to Traficom, acting as the contact point for data subjects during joint data control, by email or post. Contact information can be found in the section "Contact Information for the Data Controller Acting as the Contact Point for Data Subjects" in the privacy notice. You can also contact other parties involved in joint data control, listed in the section "Joint Data Controllers During the Data Collection Phase of the Survey."

**Right to Lodge a Complaint with the Supervisory Authority**

If you believe that the processing of your personal data is in conflict with the law, you can lodge a complaint with the Office of the Data Protection Ombudsman.

Office of the Data Protection Ombudsman  
PL 800, 00531 Helsinki  
tietosuoja(at)om.fi  
phone 029 566 6700

Right to Access Your Data	<p>The data subject has the right to obtain confirmation from the data controller as to whether personal data concerning them are being processed or not, and if such personal data are being processed, the right to access the personal data.</p> <ul style="list-style-type: none"><li>▪ Respondent register for the pilot study: data subjects can obtain the aforementioned information from the survey implementer (service provider acting as the processor of personal data) during the pilot study</li><li>▪ Sample extraction from the population information system: data subjects can obtain the aforementioned information from the survey implementer (service provider acting as the processor of personal data, contact information in the survey cover letter) during the survey</li><li>▪ Research register: data subjects can obtain the aforementioned information from the survey implementer (service provider acting as the processor of personal data, contact information in the survey cover letter) during the survey; the final research register does not contain personal data that enables direct identification, so the data subject cannot access the information they provided after the data collection ends</li><li>▪ Contact information register for the lottery/reward respondents: data subjects can obtain the aforementioned information from the survey implementer (service provider acting as the processor of personal data, contact information in the survey cover letter) during the survey.</li></ul> <p>The right of the data subject to access their personal data can be exercised when the identification data have not been deleted, and to the extent that the data in the research register can be reliably linked to a natural person.</p>
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Right to Object	<p>In situations where the processing of personal data is based on public interest, the exercise of official authority vested in the data controller, or the legitimate interest of the data controller or a third party, the data subject has the right to object to the processing of their personal data.</p> <p>If the data subject exercises their right to object, the data controller must cease processing the personal data unless the data controller can demonstrate compelling legitimate grounds for the processing that override the rights and freedoms of the data subject or if the processing is necessary for the establishment, exercise, or defense of legal claims.</p> <p>The data subject has the right to object to processing without providing any specific reasons if the data are processed for direct marketing purposes.</p> <p>In situations where the data are processed for statistical or research purposes, the data subject can object to the processing of their data on grounds relating to their particular situation, in which case the data controller must cease processing the data unless the processing is necessary for the performance of a task carried out in the public interest.</p> <p>The right to object can be exercised when the identification data have not been deleted, and to the extent that the data in the research register can be reliably linked to a natural person</p>
Right to Restrict Data Processing	<p>The data subject has the right to have the data controller restrict processing if:</p> <ul style="list-style-type: none"> <li>▪ The data subject contests the accuracy of the personal data.</li> <li>▪ The processing of personal data is unlawful, but the data subject opposes the deletion of the personal data and requests the restriction of their use instead.</li> <li>▪ The data controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise, or defense of legal claims.</li> <li>▪ The data subject has objected to the processing of personal data pending the verification of whether the legitimate grounds of the data controller override those of the data subject.</li> </ul> <p>The right of the data subject to restrict data processing can be exercised when the identification data have not been deleted, and to the extent that the data in the research register can be reliably linked to a natural person</p>
Right to Data Portability	<p>The right does not apply to the processing activities in question because the data subject has not provided the data to the data controller in a structured, commonly used, and machine-readable format, and the data are not subject to automated decision-making</p>

Right to Erasure	<p>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 deletion of their personal data. The requested data will be deleted unless the data controller has a legal basis to refuse the deletion, such as a statutory obligation to retain the data.</p> <ul style="list-style-type: none"><li>▪ Respondent register for the pilot study: data subjects can request the deletion of their data during the pilot study by notifying the survey implementer (service provider acting as the processor of personal data).</li><li>▪ Sample extraction from the population information system: data subjects can request the deletion of their data during the survey by notifying the survey implementer (service provider acting as the processor of personal data, contact information in the survey cover letter).</li><li>▪ Research register: data subjects can request the deletion of their data during the survey by notifying the survey implementer (service provider acting as the processor of personal data, contact information in the survey cover letter); the final research register does not contain personal data that enables direct identification, so the data subject cannot request the deletion of their data after the data collection ends.</li><li>▪ Contact information register for the lottery/reward respondents: data subjects can request the deletion of their data during the survey by notifying the survey implementer (service provider acting as the processor of personal data, contact information in the survey cover letter).</li></ul> <p>The right of the data subject to request the deletion of their data can be exercised when the identification data have not been deleted, and to the extent that the data in the research register can be reliably linked to a natural person</p>
Right to Withdraw Consent	<p>To the extent that personal data are processed based on the data subject's consent, the data subject can withdraw their consent at any time by notifying the data controller. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.</p> <ul style="list-style-type: none"><li>▪ Contact information register for the lottery/reward respondents: data subjects can withdraw their consent during the survey by notifying the survey implementer (service provider acting as the processor of personal data, contact information in the survey cover letter)</li></ul>