



3 January 2024  
BOF/FIN-FSA-UNRESTRICTED

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## Privacy statement – Photographs, video and audio recordings

This Privacy Statement describes, in accordance with the [General Data Protection Regulation \(EU\) 2016/679](#), how the Bank of Finland processes the personal data of people appearing in photographs, video recordings and audio recordings, and of the photographers, and the rights of the data subjects.

### 1. Name and contact details of the controller and contact details of the data protection officer

Bank of Finland  
Business ID: 0202248-1  
PO Box 160  
00101 Helsinki  
Email: kirjaamo(at)bof.fi  
Tel. +358 9 1831 (switchboard)

Contact details of the data protection officer:  
Email: tietosuojaavastaava(at)bof.fi  
Tel. +358 9 1831 (switchboard)

### 2. Purpose of the processing of the personal data and the legal basis for the processing

The Bank of Finland uses photographs, video recordings and audio recordings in its external and internal communications. Images and recordings are taken of organised events and, in the case of personnel, in other ways (e.g. promotional photographs for the Bank of Finland's website and other publications, and video and audio recordings for sharing information).

Audiovisual and visual content attracts attention better and makes materials easier to understand. Recordings of events serve those for whom the topic of the event is relevant, but who cannot attend the event. Sharing images of personnel within the organisation and, in the case of management, also online is necessary to identify and reach people. The basis for the processing of photographs and recordings is therefore necessary for the Bank of Finland's performance of tasks carried out in the public interest.

The consent of the data subject is requested for the publication of photographs and recordings, unless the data subject is in such a position at the Bank of Finland that the photograph or recording can be published without consent for the Bank of Finland's performance of tasks carried out in the public interest.

Photographs, video recordings and audio recordings may also be processed for archival purposes in the public interest and for scientific or historical research purposes in accordance with the data protection regulations in force at any given time.

### 3. Categories of data subjects, categories of personal data and information sources

Categories of data subjects:  
– Bank of Finland personnel



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- Participants in Bank of Finland events
- Photographers

Categories of personal data:

- Photographs
- Video recordings
- Audio recordings
- Any information recorded in the metadata of photographs and recordings, such as the photographer, the name of a person appearing in the image or recording, the title, the organisation, the event where the image was taken or the recording made.

The information is generally obtained from the data subjects themselves.

#### 4. Recipients or categories of recipients of the personal data

Photographs, video recordings and audio recordings may be published on the Bank of Finland's website and in social media channels, provided that consent to publish the photographs or video recordings has been obtained from the persons clearly identifiable from the images. Images of personnel may also be published for the Bank of Finland's performance of tasks carried out in the public interest (e.g. publishing a recording of a press conference, publishing pictures of management).

Photographs may be released to the press for media coverage and non-commercial purposes. Images of the Bank of Finland's management and experts are made available to the media and stakeholders on the Bank of Finland's website.

Photographs, video recordings and audio recordings may be released in response to possible requests for information insofar as they are public on the basis of the Act on the Openness of Government Activities or the party requesting them is otherwise entitled to receive them.

The following data processors are used in the processing of personal data:

- IT service providers
- Communication service providers
- Photographic service providers
- Design and layout service providers

#### 5. Information on the possible transfer of personal data to a third country or an international organisation

Images published on the Bank of Finland's website and the Bank of Finland's social media channels are generally also available outside the EU or the EEA. As a general rule, photographs, video recordings and audio recordings are not otherwise transferred outside the EU or EEA. If personal data are transferred outside of the EU or EEA, an adequate level of personal data protection is ensured, as required by data protection legislation, e.g. standard contractual clauses approved by the European Commission.

#### 6. Period for which the personal data will be stored, or the criteria used to determine that period



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Photographs, video recordings and audio recordings are stored for as long as is necessary for implementing the processing of personal data in accordance with this register. Insofar as photographs and recordings are included in material that must be archived on the basis of a decision by the National Archives of Finland, they will be stored permanently in the archives.

#### 7. General description of technical and organisational security measures

In order to protect the personal data against unauthorised access, disclosure, destruction or other unlawful processing, photographs, video recordings and audio recordings are processed in systems that have been protected with appropriate technical data protection solutions, taking potential risks into consideration. Manual material is located in premises to which unauthorised persons are prevented from accessing. Only those employees who need to process the personal data in order to perform their duties have access to unpublished photographs, video recordings and audio recordings being processed.

#### 8. Rights of the data subjects

The data subjects have the right:

- to request from the controller access to personal data concerning them and the right to request the correction or erasure of such data or to restrict or object to processing.
- insofar as processing of the personal data is based on consent, to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- to lodge a complaint about the processing of the personal data with the supervisory authority.

#### 9. Statutory or contractual requirement to provide information and consequences of failure to provide such information

If data subjects do not wish to have their voice or image recorded in an event that is to be recorded, they must submit any questions or comments in writing or after the recording of the event has been completed.