



17 June 2024
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Privacy Statement - Contact persons for data collections and recipients of minimum reserve calculations

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 contact persons for data collections and recipients of minimum reserve calculations as well as the rights of the data subjects.

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

Bank of Finland
Business ID: 0202248-1
PO Box 160
00101 Helsinki

Contact details of the person responsible for the personal data file system:

Elisabeth Flittner
Email: [elisabeth.flittner\(at\)bof.fi](mailto:elisabeth.flittner(at)bof.fi)
Tel: +358 9 183 2322

Contact details of the data protection officer:

Email: [tietosuojavastaava\(at\)bof.fi](mailto:tietosuojavastaava(at)bof.fi)
Tel: +358 9 1831 (switchboard)

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

The personal data of contact persons for data collections are processed for the implementation of the Bank of Finland's statistical data collections and other data collections. The reporting entities of the Bank of Finland's statistical data collections and other data collections include financial institutions, payment institutions, investment funds, capital and real estate funds and domestic credit institutions, foreign branches of credit institutions that are in a member state providing domestic data, other financial institutions, crowdfunding and peer-to-peer lending intermediaries, employment pension institutions, insurance institutions, companies, and registered legal entities and natural persons providing payment services without authorisation.

The Bank of Finland's authority to obtain information is based on the following provisions:

- Council Regulation (EC) No. 2533/98 on the powers of the European Central Bank to collect statistical data, as amended by Council Regulation (EC) No. 951/2009.
- Act on the Bank of Finland (sections 26 and 28)
- Regulation on markets in financial instruments (EU) No. 600/2014 (MiFIR)
- Regulation of the European Central Bank concerning statistics on holdings of securities (ECB/2012/24),
- Regulation of the European Central Bank concerning statistics on interest rates applied by monetary financial institutions (ECB/2013/34),



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- Regulation of the European Central Bank concerning statistics on the assets and liabilities of investment funds (ECB/2013/38),
- Regulation on payment transaction statistics of the European Central Bank (EKP/2013/43),
- Regulation of the European Central Bank concerning statistics on the money markets (ECB/2014/48),
- Regulation of the European Central Bank on statistical reporting requirements for insurance corporations (ECB/2014/50), Regulation of the European Central Bank on the collection of granular credit and credit risk data (ECB/2016/13, AnaCredit Regulation),
- Regulation of the European Central Bank on the balance sheet items of credit institutions and of the monetary financial institutions sector (ECB/2021/2),
- Regulation of the European Central Bank on statistical reporting requirements for pension funds (ECB/2018/2),
- Act on Payment Institutions, and
- Act on Credit Institutions.

The data of the recipients of minimum reserve calculations are processed in order to submit the minimum reserve calculations. The submission of minimum reserve calculations is based on the ECB's regulation on the application of minimum reserves (ECB/2021/1).

The data of users of the Reporting Service and recipients of minimum reserve calculations are also processed to meet the obligations set out in Act on Information Management in Public Administration.

In addition, the data are processed for the planning and development of the Bank of Finland's services, operations and information systems. In this regard, a basis for processing personal data is the need to process data for the controller's performance of tasks in the public interest.

3. Categories of data subjects, personal data processed and source of data

Categories of data subjects:

- Contact persons for statistical data collections and other data collections
- Contact persons for recipients of minimum reserve calculations
- Users of the Reporting Service.

Personal data processed:

- Contact information: name, telephone number and email address
- The company that the person represents
- Communication with the data subject
- The following data are processed on the users of the Reporting Service: Identification information, including personal identification number, language selection, automated messages and log information about the use of the service.

Personal data are obtained from the data subjects themselves, from the company for which the contact person is registered, or from the Financial Supervisory Authority. When using Suomi.fi e-Identification, however, identification and authorisation information is obtained from the Digital and Population Data Services Agency, which also collects transaction data on the use of the Reporting Service.

4. Recipients or categories of recipients of the personal data



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The Bank of Finland does not, as a rule, disclose data to third parties. Personal data may be disclosed in possible requests for information insofar as the information is public on the basis of the Act on the Openness of Government Activities or the party requesting the information otherwise has the right to receive the information.

The Bank of Finland uses the following data processors:

- IT service providers
- Communication service providers.

5. Notification of possible transfer of personal data to a third country or an international organisation

Data are not transferred outside the EU or the EEA or to international organisations.

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

Contact information is stored for as long as the person is a reporting contact person for statistical data collections and other data collections or a contact person for recipients of minimum reserve calculations. Right of access data for the Reporting Service are stored two years from the last time the Reporting System was used. Other data are stored as long as necessary for the purposes of processing personal data or to comply with statutory obligations.

7. General description of technical and organisational security measures

In order to protect personal data against unauthorised access, disclosure, destruction or other unlawful processing, personal data 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 personal data in order to perform their duties have access to the personal data being processed.

8. Rights of data subjects

The data subjects have the right:

- to request from the controller access to personal data concerning them as well as the right to request the rectification or erasure of such data or restriction of processing or to object to processing as well as the right to transfer data from one system to another
- insofar as processing of 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 personal data with a supervisory authority.

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



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If the user of the Reporting Service does not provide the information necessary to register as a user, the Reporting Service cannot be used.

Reporting entities must comply with the reporting requirements of the European Central Bank (ECB) related to statistics or the requirements set by the Bank of Finland. Reporting entities must submit the information of one or more contact persons for statistical data collections or other data collections to the relevant national central bank.

In accordance with Article 7(1) of Regulation (EC) No. 2533/98, the ECB may impose sanctions on reporting entities that do not comply with the statistical reporting requirements set out in regulations or decisions.