

Description of file of the personal credit data file

(Personal Data Act 523/99 Section 10)

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Controller

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Person in charge of the matters regarding the files

Risto Kallio

Additional information and requests for rectification

Suomen Asiakastieto Oy
Consumer service

Line of business of the controller

As its line of business, the company is engaged in professional credit data activities. Relating to the activities, the controller processes personal data. The controller has filed a notification in accordance with Section 38 of the Credit Information Act on its activities.

File used in the activity

The Ahti personal data file and Asta company data file of Suomen Asiakastieto Oy

Purpose of the processing of personal data

Personal credit data activity (Credit Information Act)

The controller also uses the file for realising the use of rights of notification and access (Credit Information Act 30§).

Registered data is also used in the research activity carried out or supported by the controller, and for statistical purposes. In the research activity and for statistical purposes, data is processed so that it cannot be identified to concern a certain person.

Description of the group of data subjects and data categories in the file

The file only contains information on such persons and their contact data, for whom data on the neglect of payment or settlement (payment default) or some other data according to Section 12 or 13 of the Credit Information Act has been recorded. The recorded data is based on the Credit Information Act.

In connection of a payment default entry, the quality of the payment default, possible monetary amount, data source, possible creditor data, date of registration and date of default (for example, the date when the judgment on payment was rendered or the lack of means stated), are given. Also other data relating to the payment default stated in the Credit Information Act may be entered in the file. Upon registering data on the settlement of

payment, the date, when the information on the settlement has been obtained, and the date of payment are entered. The file contains data stating the destinations to which the data has been disclosed during the past 12 months.

Payment default data is kept in the file for the period stated in the attachment (attachment 1). When payment defaults have been deleted from the file, they are kept for 12 months to fulfil the obligation of the controller indicated in Section 30 of the Credit Information Act. Thus, when necessary, it can be found out to which destinations the data has been disclosed during the past 12 months. During this period, the data is not shown outwards, nor disclosed in any form. The data is only disclosed to the data subject for realising their rights. The data is also used for enabling the controller to point out the grounds for the lengthening of recording times for payment defaults (Credit Information Act, Section 1, Paragraph 3).

The file contains data on which companies the person is or has been a person in charge in accordance with Section 3, Paragraph 3 of the Credit Information Act. Personal credit data and data on participation in companies of persons in charge are also used for the rating of companies. Data on participation in companies is deleted according to Section 17 of the Credit Information Act.

Disclosure of data

Personal credit data is only disclosed to traders on the basis of a client contract to be used for credit granting, credit controlling or other similar purposes stated in Section 19 of the Credit Information Act. Credit data can also be disclosed to a person (Credit Information Act, Section 10), who needs data in a single case. Data is also disclosed to the data subjects at their request. Data on participation in companies may be disclosed without a purpose of use stated in the Act.

Description of the principles of file protection

The file is maintained in the premises of the controller, provided with appropriate protection and access control systems.

The prevention of misuse and penetration attempts is carried out with technical and application solutions of different levels.

Separate control software is used in the control of client connections. In browser-based services, the SSL encryption is used. In the application interfaces based on the use of a subroutine library, the data communications are encrypted by a strong encryption, based on the method of public and secret keys and changed for every transaction. The clients are identified by user IDs and passwords that are personal in the online services.

The data warehouse is backed up daily.

Control of use

The users have personal user IDs and passwords, on the basis of which the users are identified.

Single users (Credit Information Act, Section 10) are identified with the Tupas identification service of banks.

The persons employed by the controller have signed an obligation to observe secrecy.

User authorisations of different levels have been defined for the personnel. The personnel has been familiarised with the legislation.

In connection of the use of the right of access, the data subject is informed of the destinations to which the personal credit data on them has been disclosed during the past 12 months. In

this way, the data subject can make sure of the legality of the disclosures. The right of access does not extend to disclosures of data on participation in companies.

If the person has not been entered in the credit data file, the controller does not keep a file on the inquiries directed at the person or disclose data on inquiries to the persons inspecting their data.

The user of data has the obligation to account for the purpose of use of personal credit data, at the request of the controller, data subject or authority. The controller shall also on its own initiative control the use of personal credit data by sending account requests to users and by guiding to act in accordance with the law.

In connection of a request concerning personal credit data, the user as the client is automatically informed of the purposes for which personal credit data may be used according to the law. In connection of a personal credit data request, the client has to choose and report the purpose of use according to the law before looking up the data.

Single users (Credit Information Act, Section) undertake to comply with the conditions of use when conducting inquiries. The users undertake to request and use personal credit data (participation in companies excluded) solely for purposes according to the law. The users are also informed of the content of the legislation.

Rights of the data subject

The data subjects are informed of the processing of data according to the Credit Information Act. Upon using the right of access according to the law, the data subject has to prove their identity, either in connection of a personal visit or by enclosing a copy of the official identity card to the written request. Persons can also buy their own credit data via the Internet. In this case the person is identified with the Tupas identification service of banks.

The controller shall, on own initiative or at the request of the data subject, erase, rectify or supplement erroneous, unnecessary, incomplete or obsolete data contained in its data file without undue delay. Essential in the rectification, supplementing or erasing is the purpose of use of data, i.e. credit data activity.

Transfer of personal data to outside the European Union or the European Economic Area

Data is not transferred to outside the European Union or the European Economic Area without the express consent of the data subject.

Data sources

Trade Register: person in charge positions
Companies granting consumer credits: consumer credit defaults
District courts: public payment defaults
Credit and financial institutions and other parties granting and guaranteeing loans: neglected payments acknowledged by the debtor in writing (voluntary debt restructurings)
Legal Register Centre: data on debt restructurings, bankruptcy data
Police authorities, city administrative courts and register offices: protests of a bill
Data subjects: settlements of payments
Enforcement authorities: enforcement data and data on lack of means, settlements of payments
The Official Gazette: data on guardianship, compulsory auctions, public notices
Creditors: settlements of payments
Tax authorities: tax withholding accountings and VAT instalments
Population Register Centre: targeting of persons' basic data, data on the competence to act

Attachment Payment defaults and their recording times