

Description of file of data on persons with business involvement

(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 and marketing information database activities.

Files used in the activity

The company data file, credit data file and companies' decision-maker file of Suomen Asiakastieto Oy

Purpose of the processing of personal data

Relating to the credit data activity, the controller collects, maintains and publishes data serving the commerce and industry, and sells services relating to credit granting and other financial decision-making.

Also personal data is processed in the credit data activity concerning companies. The company data includes generally available information on the status and duties of persons participating in the companies, and on the management of these duties in business.

Data on persons with business involvement is processed and disclosed to clients in connection of data on the company, to be used for safeguarding interests and rights. Data is also disclosed for the assessment of a person's financial standing and ability to meet engagements.

Data on companies' persons in charge according to Section 3, Paragraph 3 of the Credit Information Act is processed according to the Credit Information Act in the rating of companies.

Data on persons with business involvement is also processed for marketing purposes.

The processing is based on the Personal Data Act, Section 8, Paragraph 1, Subparagraph 8, and Section 19, Paragraph 3.

The controller also processes data in the research activity carried out or supported by it, 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.

The controller also uses the file for realising the right of access (Personal Data Act, Section 26, Credit Information Act, Section 30).

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

Data describing a person's status or duties:

- the ordinary member, deputy member, chairman, or deputy chairman of the Board of Directors; managing director, substitute managing director, deputy managing director;
- chairman, deputy chairman, ordinary member, or deputy member of the Board of Administration;
- house manager, deputy house manager;
- general partner of a partnership or limited partnership; silent partner of a limited partnership;
- sole trader, owner of a firm;
- authorised signatory, holder of procuration;
- responsible manager, trader's representative in Finland, administrative manager, foreign representative;
- shareholder, founder shareholder;
- auditor, principally responsible auditor, deputy auditor, and additional auditor;
- trustee in bankruptcy, liquidator, deputy liquidator, and administrator in restructuring proceedings.

Data relating to these positions:

- position, name, profession, address, personal identity number, domicile, start and/or end date of the position or date of the information, citizenship, business ID given to the person.

In addition to this information, the following data can be recorded for a person with business involvement:

- supplementary account to Trade Register data, supplied by the data subject
- of shareholders, their share of ownership and/or number of shares
- of holders of procuration, the signing for the firm

Persons' possible payment default data is processed as personal credit data.

Disclosure of data

Data is regularly disclosed to the clients of the controller, who have made a client contract on the use of credit data with the controller. Data generally available at the Trade Register is disclosed without client contract so that it must be possible to find out the end user of the data. Data is only disclosed to safeguard the interests and rights of the clients.

Data on private persons, however not credit data, is also disclosed for direct marketing purposes and other dispatches with address.

Description of the principles of file protection

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

In the client contracts, the user has undertaken to use the data only for purposes allowed by the law, i.e. for safeguarding their interests and rights.

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.

Rights of the data subject

The data subjects are informed of the processing of data according to the Personal Data 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.

The controller shall, on own initiative or at the justified 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.

The data subject has the right to forbid the controller to process data concerning them for direct advertising, telesales and direct marketing.

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

Data on persons in charge according to the Trade Register is disclosed with the company's data (Grounds for disclosure: Personal Data Act, Section 23, Paragraph 1, Subparagraphs 1, 2 and 3.)

Data sources

Esmerk: company news
Trade Register: data on persons with business involvement to be entered in the Trade Register, rights of procuration and of signing for the firm
Companies granting consumer credits: consumer credit defaults

District courts: public payment defaults
Credit and financial institutions and other quarters 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
Data subjects with business involvement: data necessary for credit data activities
Enforcement authorities: enforcement data and data on lack of means
Creditors: settlements of payments
Tax authorities: tax withholding accountings and VAT instalments
The Official Gazette: data on guardianship, compulsory auctions, public notices
Population Register Centre: targeting of persons' basic data, data on the competence to act
Companies: shareholder data, members of Boards of Directors, managing director, owners of
a company; information about drafts

Attachment Payment defaults and their recording times