



15.4.2024  
SP/FIVA-EI RAJOITETTU

Julkinen

## Privacy Statement – Data in the Positive Credit Register

This Privacy Statement describes, in accordance with the [General Data Protection Regulation \(EU\) 2016/679](#) (GDPR), how the Bank of Finland processes the personal data of debtors and guarantors registered in the Positive Credit Register maintained by the Tax Administration, 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: tietosuojavastaava(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 processes data in the Positive Credit Register in order to perform the following tasks laid down for it in the Act on the Bank of Finland:

- Executing monetary policy
- Ensuring the reliability and efficiency of the financial system and its development
- Compiling and publishing statistics as necessary for carrying out its activities

In accordance with the GDPR, the basis for processing the data is, therefore, that the processing of the personal data is necessary for the Bank of Finland's performance of its tasks in the public interest.

The personal data may also be processed for scientific research purposes in the public interest in accordance with the data protection regulations in force at any given time.

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

Categories of data subjects:

- Debtors registered in the Positive Credit Register
- Guarantors registered in the Positive Credit Register

The personal data processed are:

- basic information on the debtor's consumer credits, leases comparable to consumer credits and loans brokered to the debtor by a peer-to-peer loan broker (including information on lenders, loan identification numbers, numbers of debtors, dates of conclusion of loan contracts, types of loans, loan currencies, one-time expenses paid as the loan contract is concluded, amounts of lump sum



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- loans, purposes of use of loans and payment plans and credit limits of running-account loans as well as start dates, instalments and transaction prices of leases)
- information on Kela guarantee receivables for student loans
  - interest information (including total interest rates, marginal interest rates, types of interest, effective interest rate on date of conclusion, upper and lower limits of any interest rate corridors, any interest rate caps, and the end dates of any interest rate restrictions)
  - information on collateral (types of any collateral, identifiers of guarantors)
  - information on amortisations and deferrals of amortisations (including amortisations paid, interest and other loan expenses, payment dates, remaining balances of lump sum loans and amounts of running-account loan balances)
  - information on delayed amounts and on accelerations of loans (unpaid amount, original due date and date of acceleration)
  - information on debt arrangements and business restructurings
  - income information (gross and net income established during lending process and according to Income Register)
  - information on end and transfer of loans

The information is obtained from the Positive Credit Register maintained by the Tax Administration in pseudonymised form, i.e. without names, contact details, personal identification numbers or loan numbers that would enable the Bank of Finland to identify individual debtors and guarantors. More information about the Positive Credit Register is available at: [Positive Credit Register - Information for private individuals \(vero.fi\)](#)

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

The Bank of Finland does not disclose the personal data to third parties.

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

- IT service providers
- communications service providers

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

The personal data are not, as a rule, transferred outside of the EU or the EEA. In individual cases, however, processors of the personal data may have access to personal data from outside the EU or EEA in connection with support and maintenance activities. If data are transferred outside of the EU or the EEA, an adequate level of protection of personal data is ensured as required by data protection legislation, for example by transferring data to a country where, by decision of the European Commission, an adequate level of data protection is ensured or using 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

The personal data will be stored for 40 years. The storage period is based on the fact that, in order to perform the Bank of Finland's tasks, it is essential that the data in the Positive Credit Register cover a



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sufficiently long history to provide a view of how household indebtedness develops in different economic cycles and financial conditions.

#### 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, the personal data are processed in systems that have been protected with appropriate technical data protection solutions, taking potential risks into consideration. Only those employees who need to process the personal data in order to perform their duties have access to the personal data 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 of such data or to restrict or object to processing, and
- to lodge a complaint about the processing of the personal data with the supervisory authority.