



13 June 2018

**Unrestricted**

## **Record of processing activities**

<b>This Privacy Statement has been published on the Bank of Finland's website <a href="http://www.suomenpankki.fi/data-protection/">www.suomenpankki.fi/data-protection/</a>.</b>
<b>1. Name of the personal data file system</b>
Photograph collection
<b>2. Name and contact details of controller and contact details of data protection officer</b>
<p>Bank of Finland (in respect of Bank of Finland's data collections) Business ID 0202248-1 PO Box 160 00101 Helsinki</p> <p>Contact details of the person responsible for the personal data file system: Elisa Newby Email: info(at)bof.fi Tel. +358 9 183 2626 (Communications customer service)</p> <p>Contact details of the data protection officer: Pasi Hänninen Email: tietosuojaavastaava(at)bof.fi Tel. +358 9 1831 (switchboard)</p>
<b>3. Purpose of the processing of personal data and the legal basis for the processing</b>
<p>The Bank of Finland's photograph collection is an electronic image collection. In connection with the metadata of the images, the names of persons are mentioned in the case of some persons. The photograph collection includes a number of different catalogues, in which images have been collected according to different criteria.</p> <p>Images may be published in the Bank of Finland's online services and in social media channels used by the Bank of Finland.</p> <p>The legal basis for the processing is the consent granted by the data subject for the processing of personnel data.</p>



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**4. Categories of data subjects and categories of personal data**

Categories of data subjects:

- The Bank of Finland's employees and external visitors

Categories of personal data:

- Photographs from which persons are recognisable
- The names of some persons pictured may be written in the metadata of photographs

**5. Recipients or categories of recipients of the personal data**

The Bank of Finland's images intended for internal use are not disclosed outside of the organisation nor are they uploaded to external online services.

The Bank of Finland's images intended for public use may be disclosed to e.g. the press or for non-commercial publication purposes. Images may also be published in the Bank of Finland's online services and in the Bank of Finland's social media channels.

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

Images published in the Bank of Finland's online services and in the Bank of Finland's social media channels are publicly available.

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

Photographs are stored in the Bank of Finland's photograph collection indefinitely.

**8. General description of technical and organisational security measures**

In order to protect personal data against unauthorised access, disclosure, destruction or other unlawful processing, appropriate technical and organisational security measures are used, taking potential risks into consideration. Such measures include the use of secure equipment premises as well as restriction of access to the photographic collection's software by means of access rights.

**9. Rights of data subjects**

The data subjects in the personal data file system have the right:

- to request from the controller access to personal data concerning them and the right to request the restriction or erasure of such data or to restrict processing or object to processing.
- 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.



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

Subjects are notified about photography in connection with events. When persons participate in an event, they consent to the possibility of being photographed.