

Privacy statement

1 Name of the register

Proxion Plan Oy's training register

2 Controller

Proxion Plan Oy
Ratamestarinkatu 7A
00520 Helsinki, Finland
Business ID: 2261569-8

Tel. +358 207 495 400
Email: info@proxion.fi

3 Contact person for register-related matters

Kaisa Pakanen
Proxion Plan Oy
Tel. +358 44 49 73 103
Email: kaisa.pakanen@proxion.fi

4 Purpose of processing personal data

The register is used for managing Proxion Plan Oy's (Rataopisto) training-related customer relationships as well as for customer communications and management of training information in accordance with the requirements for training institution operations. The processing of personal data has been limited to what is necessary for creating, managing and developing a customer relationship and providing training services.

The primary basis for processing personal data is a customer relationship between the controller and the data subject as well as the consent given by the data subject in connection with registration or on a personal data form regarding the storing of data in the controller's training register. Another basis for processing personal data is the controller's legitimate interest, in other words the controller maintains the data to meet the requirements set for training institution operations.

5 Content of the register

The training register consists of an electronic system and a physical training archive.

Data stored in the electronic system:

- Person's name
- Date of birth or personal identity code
- Address
- Email address
- Employer's name, contact person and invoicing details

- Information about completed training and related achievements

The data stored in the training archive is given by an individual on a personal data form and it is the same data recorded in the electronic database.

6 Sources of data

The data stored in the register is compiled from the data given by the data subject or their employer's contact person in connection with registration (online, by telephone or email) and data provided by the data subject on a personal data form when participating in the training event. The data regarding training achievements is created on the basis of training participation and related achievements.

7 Disclosure of data

Data regarding training achievements is disclosed to data subjects themselves by request.

Data regarding training achievements can be disclosed to the contact person of the data subject's employer if the employer confirms that the data subject is an employee of the company in question and the company has been authorised by the data subject to request the data.

Data is disclosed to the Finnish Transport Safety Agency if the participant wants so-called Trafi recognition. Disclosures are based on the Act on the Professional Qualifications of Lorry and Bus Drivers (273/2007). Disclosures take place using the Finnish Transport Safety Agency's form. The information disclosed consists of the participant's personal data and details of completed training.

In addition, data may be disclosed if it is necessary due to a law, regulation or lawful request or as defence against legal claims.

8 Transfer of data to third countries

No data in the register is transferred outside of the EU or the European Economic Area.

9 Principles of data protection

The controller organisation has established guidelines regarding the use of the register. The use of the electronic register requires a personal username and password. Access rights are given to those employees of the controller who need the data to do their work. All individuals with access to the register have signed a non-disclosure agreement as part of their employment contract.

The register is located on a server maintained by the controller's service provider. The service provider is responsible for the technical maintenance and protection of the environment in accordance with the agreement between the parties.

The data in the physical training archive is kept in lockable cabinets within the controller's premises. Access to data is given to those employees of the controller who need the data to do their work. All individuals with access to the data in the training archive have signed a non-disclosure agreement as part of their employment contract.

10 Data storage period

Data is stored in the register throughout the duration of a customer relationship and the validity of the training-related qualification in compliance with the requirements set for training institution operations.

11 Right of access, rectification and right to prohibit processing

The privacy statement is available on the Proxion website and, if necessary, can also be sent separately to a data subject.

Data subjects have the right to access their data in the register. A free format request must be submitted to the contact person specified in section 3 either with a signature or comparable form of verification.

The controller will, on its own initiative or at the request of the data subject, rectify erroneous, unnecessary, incomplete or obsolete data. A free format request must be submitted to the contact person specified in section 3. It must be specified in the request which data is to be rectified and on what basis. The data will be rectified without delay. Parties to which the data has been disclosed will also be informed of the rectification.

Data subjects have the right to request the erasure of their personal data. The request must be submitted to the contact person specified in section 3 either with a signature or comparable form of verification. The controller will remove the personal data from the register within a reasonable time after being personally requested by a data subject if the removal of data is possible considering the regulations related to training institution operations.

12 Supervisory authority

Data subjects have the right to submit data protection matters to the supervisory authority (Data Protection Ombudsman) for consideration.