

29 August 2023

Privacy policy, ASP credits and guarantees customer data register

1. Controller	<p>Name State Treasury</p> <p>Address Sörnäisten rantatie 13, P.O. Box 14, FI-00054 State Treasury</p> <p>Other contact details (e.g., tel. no. during office hours, email address) tel. +358 (0)295 50 2000, registry(at)statetreasury.fi</p>
2. Data protection officer and contact person in matters related to the register	<p>Data protection officer Heikki Kangas, tel. +358 (0)295 502 156, tietosuojavastaava(at)valtiokonttori.fi</p> <p>Contact person in matters related to the register Soile Karttunen, tel. +358 (0)295 503 313, soile.karttunen(at)valtiokonttori.fi</p>
3. Register name	ASP credits and guarantees customer register
4. Legal basis and purpose for processing of personal data	<p>Under Section 2, Subsection 1, Paragraph 1 of the Act on the State Treasury (1991/305), the State Treasury is responsible for arranging loan servicing for government agencies and institutions. According to the rules of procedure of the State Treasury, the task is assigned to the Finance Division, and the division has assigned it to Lending.</p> <p>The processing of personal data in the ASP credits and guarantees group of the State Treasury is based on Article 6(1) (a;b;c;e) of EU's General Data Protection Regulation. The collection, processing and disclosure of data is necessary for the performance of the State Treasury's statutory obligations. The purpose of processing personal data is to manage the State Treasury's statutory obligations related to interest subsidies and guarantees granted by private individuals on housing loans. A statutory obligation of the State Treasury is to ensure that the legislation related to the housing allowance system (asp system) is complied with both when granting credit and when managing credit. Statutory supervisory tasks also include monitoring that the provisions of the act on interest subsidies for loans granted for the purchase of one's own apartment (lainojen korkotuesta annettu laki) are complied with during the interest subsidy period of an apartment purchased with an asp loan. Regarding state guarantees for owner-occupied housing loans, the State Treasury is responsible for paying the guarantee compensation based on the state guarantee in accordance with the act on the state guarantee for owner-occupied housing loans (omistusasuntolainojen valtioneuvoston annettu laki), and for recovering the guarantee compensation paid or waiving the recovery of the claim recourse on application.</p> <p>Personal data are used in the processing of interest subsidy and guarantee applications and when making decisions. The data are used when the State Treasury decides whether a guarantee compensation is paid to the bank based on the state guarantee. The collected data are also used to pay interest subsidies from state funds. The data will also be used in situations where, on the application of the data subject, it is assessed whether the conditions for waiving a guarantee requirement laid down in Section 13 of the act on the state guarantee for owner-occupied housing loans are met. Non-enforcement under Section 13 is possible in situations where the borrower cannot reasonably be considered to be able to pay due to permanent incapacity for work, long-term unemployment, liability for maintenance or other comparable</p>



	<p>reasons. Therefore, it is possible that the processing of applications for waiving a guarantee requirement involves the processing of data on the health of the data subject, which are special personal data according to Article 9, Paragraph 1 of the General Data Protection Regulation. In this respect, the processing of data is based on the statutory obligations of the State Treasury, in which case pursuant to Section 6, Subsection 1, Paragraph 2 of the Data Protection Act (05 December 2018/1050), the prohibition laid down in Article 9 of the General Data Protection Regulation on the processing of such data is not applicable. However, special personal data will only be processed if the data subject submits these data to the State Treasury in connection with their application.</p> <p>The collected data also ensure that the customer's data are always up to date. The data help to identify the customer in a customer service situation. These data are also used to test loan management systems. In this case, the aim is to ensure that the customer's data are transferred to the systems without errors and that they remain consistent and accurate.</p>
5. Information content of the register	<p>The register contains information on the recipients of interest subsidy loan and state guarantee, loan managers or guardians and other legal representatives as well as ASP savers.</p> <p>Only the necessary information is collected on the above-mentioned persons. It may include their name, date of birth or personal identity code/business ID, contact details, municipality of residence, non-disclosure for personal safety or non-disclosure of personal information, language, status (deceased, under guardianship or bankrupt), information related to debtor status, loan payment information, payment default entries and follow-up data from Suomen asiakastieto Oy.</p> <p>If necessary, the customer may be asked to provide different reports of estates and their shareholders. Additionally, different types of reports of the customer's financial and health status may be requested insofar as they are necessary for processing statutory applications for waiving the recovery of the claim recourse. In this context, it is possible that we also request information on the financial situation of the data subject's spouse.</p>
6. Ordinary information sources	<p>Personal data are collected from the data subject themselves when the data subject discloses data to the State Treasury, for example in connection with processing their application. Personal data are also obtained from banks that grant housing credit and other parties that manage them, such as debt collection agencies. These parties disclose information to the State Treasury in connection with the processing of applications and regularly using an electronic data transfer method.</p> <p>Personal data can also be collected from other external sources, such as the Population Information System, the National Land Survey of Finland, the Tax Administration's register, the Business Information System and Suomen asiakastieto Oy, as well as debt recovery authorities and courts.</p>



7. Regular disclosures of data	<p>Data may be disclosed to other authorities and to banks that have granted loans and debt collection agencies managing loans to the extent required by law.</p> <p>Data may also be disclosed to other authorities, such as the Finnish Tax Administration and Statistics Finland, if this is required by law. The disclosure of data is based on the performance of statutory obligations, and data is only disclosed to the extent necessary.</p> <p>Data may also be seen by application suppliers in a contractual relationship with the State Treasury in situations where the application supplier must rectify a fault situation in the information system used for processing the data or where changes to the information system are tested.</p>
8. Regular disclosures of personal data or transfer of data to outside the EU or the EEA	Information is not disclosed or transferred to recipients outside the EU or EEA.
9. Principles for register protection	<p>The State Treasury takes data protection issues into consideration in all its activities. The State Treasury has defined data protection principles that describe the processes followed by the State Treasury when processing personal data. The data protection principles are updated regularly.</p> <p>Personal data are protected by both technical means and procedures related to the organisation, administration and procedures. These measures protect data against loss, misuse and destruction and against unauthorised use or disclosure.</p> <p>The data are processed in locked physical facilities and electronic systems that can only be accessed by State Treasury personnel. All employees of the State Treasury have an obligation of secrecy based on their official position or employment relationship. The processing of data is only permitted for persons whose duties involve the processing of personal data at any given time. All employees have been security cleared. Application suppliers and service providers that have a contractual relationship with the State Treasury are also bound by secrecy provisions.</p> <p>The State Treasury's systems are protected, and user rights are defined individually for each employee. Personnel can only view personal data to which they have been granted access rights.</p> <p>A procedure for identifying a customer is followed to ensure that data are not disclosed to persons who do not have rights to them. The State Treasury has issued guidelines on sending documents and identifying the party concerned. As a rule, customer identification takes place in an electronic signature system in which the customer uses online banking IDs, or another means of strong identification. When signing documents, the customer can also be identified with an identity document, or another means of strong identification. As a rule, decisions and other documents are delivered by post.</p>
10. Data storage period/ criteria for determining storage period	The retention periods for contracts and other documents are specified in the State Treasury's archive formation plan and records management plan. The data will be stored for 10 years after the end of the customer relationship. The data will be deleted from the register after the deadline.
11. Information on automated decision-making	The State Treasury does not make automatic decisions related to asp credits and state guarantees for owner-occupied housing loans.



12. Right of access	<p>The data subject has the right to access their data in the register. The request must be submitted in writing either by e-mail or by post. In their access request, the data subject must present the identification information needed to find the data according to these instructions. Requests should be sent to the State Treasury's registry office:</p> <p>E-mail: kirjaamo(at)valtiokonttori.fi Postal address: Sörnäisten rantatie 13, P.O. Box 14, FI-00054 State Treasury</p> <p>In the event that the data subject has exercised their right of access less than one year ago, the State Treasury may collect a fee based on the administrative costs caused by the provision of the data.</p>
13. Rectification of data	<p>Data subjects are entitled to request corrections to any incorrect information the register may contain on them. Requests should be sent to the State Treasury's registry office as described in paragraph 12.</p> <p>If incorrect, unnecessary, incomplete or otherwise obsolete data is detected through inspection by personnel or automated inspection on one's own initiative, such information shall be corrected or deleted immediately.</p>
14. The right to object to processing of personal data	<p>The State Treasury processes personal data in order to carry out its statutory obligations, and therefore, the data subject does not have the right to object to the processing of their personal data.</p>
15. Right to rectification or erasure or restriction of processing	<p>The data subject has the right to demand that the State Treasury rectify, without undue delay, inaccurate and incorrect personal data concerning the data subject according to Article 16 of the EU's General Data Protection Regulation.</p> <p>The State Treasury processes personal data in order to fulfil its statutory obligation, and the data subject is therefore not entitled to have their data deleted before the end of the storage period described in paragraph 10.</p> <p>The data subject has the right request a restriction on the processing of their personal data as specified in Article 18 of the EU's General Data Protection Regulation. Requests should be sent to the State Treasury's registry office as described in paragraph 12.</p>
16. Right to lodge a complaint	<p>The data subject has the right to lodge a complaint with a supervisory authority if the data subject believes that their rights have been infringed by the actions of the controller. The supervisory authority is the Office of the Data Protection Ombudsman:</p> <p>E-mail: tietosuoja(at)om.fi Postal address: P.O. Box 800, FI-00531 Helsinki</p>
17. Other rights	<p>Personal data is neither used nor disclosed for the purposes of direct advertising, distance marketing or other direct marketing, market and opinion research, registers of individuals, or genealogies.</p>
18. Use of cookies	<p>The valtiokonttori.fi website uses cookies. For more information on the use of cookies, see paragraph 19 of the privacy policy of the valtiokonttori.fi website.</p> <p>Cookies are not used in systems related to the servicing of loans, guarantees and interest subsidies.</p>

