



19.11.2019

## **RECORD OF PROCESSING ACTIVITIES**

EU General Data Protection Regulation, Article 30

### **1. Controller**

Office of the Parliamentary Ombudsman  
Arkadiankatu 3, 00102 Eduskunta, Helsinki, Finland  
Telephone: +358 9 432 3381 (registry)  
Email: oikeusasiat@eduskunta.fi

The register is also used with restricted access rights by the Human Rights Centre, which is administratively incorporated into the Office of the Parliamentary Ombudsman, to discharge its duties.

### **2. Contact person in matters related to the register and data protection officer**

Registry, registrar  
Email: oikeusasiat@eduskunta.fi  
Telephone: +358 9 432 3381 (registry)

The duties of the controller's data protection officer are discharged by Deputy-Ombudsman Pasi Pölönen, whose contact details in data protection matters are the same as the registry's contact details.

### **3. Name of the register**

Case management system of the Office of the Parliamentary Ombudsman (as of 4 January 2016)  
Record of the Office of the Parliamentary Ombudsman (before 4 January 2016)

### **4. Purpose of processing personal data**

Personal data are processed by the Office of the Parliamentary Ombudsman in connection with the Parliamentary Ombudsman's duty of oversight of legality as laid down in the constitution and the Parliamentary Ombudsman Act, as well as for the general, human resources and financial administration of the Office of the Parliamentary Ombudsman.

The Parliamentary Ombudsman's legal basis for processing personal data in the course of the oversight of legality is Article 6(1)(c) of the General Data Protection Regulation (processing is necessary for compliance with a legal obligation to which the controller is subject).

The legal basis for processing special categories of personal data is Article 9(2)(g) of the General Data Protection Regulation (processing is necessary for reasons of substantial public interest) and section 6, subsection 1, point 2 of the Finnish Data Protection Act. The legal basis for processing personal data associated with criminal convictions and offences is Article 10 of the General Data Protection Regulation and section 7, subsection 1, point 2 of the Finnish Data Protection Act.

## **5. Data content of the register**

The alternative types of personal data content in the documents stored on the case management system are defined in the information management plan.

As regards cases concerning the oversight of legality (complaints, own-initiative investigations, requests for statements and hearings, inspections, oversight of closed institutions and oversight of the rights of disabled people), the stored data includes the case number, name and contact details of the complainant or other sender, date and reception date of the complaint or case, the name of the authority or other overseen party that is the subject of the case, an outline description of the content of the case, the party advising and deciding on the case, the phases in the preparation of the complaint and the decision. The data stored from written communications are the sender's name, contact details, data and reception date.

As regards inspections, the data stored include the subject of the inspection, timing and people performing the inspection, documents related to the inspection and the inspection protocol.

The data stored on the Office's administrative cases are the title, name of the person filing the case, date of filing, name of the decision-maker and decision date. The title of the case includes a reference to the content of the decision (e.g., granting leave of absence). The content of the decision is described in more detail in the decision document. The data stored on recruitment matters also include applications, memoranda of appointments and appointment decisions. The data stored on procurement matters are the call for tenders, tender documents and contract documents, including dates and information on the sender.

Cases from before 1990 are stored on manual record cards. The information content of the cards is otherwise the same as the computer records, but the complainant's contact details and the date of the complaint are not stored. The complainant's rank/profession is often mentioned on the cards. The cards are stored in alphabetical order by the complaint's surname, sorted by year.

The record cards were also used to prepare record sheets. These were prepared annually in order of record numbers. Before the record cards were introduced, a record book was used. This included the complainant's name, the date of reception of the complaint and the actions that were the subject of the complaint.

The Office of the Parliamentary Ombudsman also holds a card file arranged in alphabetical order by the complainant's name for the years from 1985 to 1990. The information content is the same as on the manual cards. At the beginning of this card file is a card file of complaints received via Members of Parliament arranged in alphabetical order by the names of the Members of Parliament (for the period from 1985 to 1990).

These state the Member of Parliament's name, record number, complainant's name and date of reception of the complaint.

The Office of the Parliamentary Ombudsman deployed a case management system on 4 January 2016, initially for processing cases related to the management of administrative cases, and the use of the system was expanded to cover cases concerning the oversight of legality as of 1 April 2016. The system is used to process data related to cases and documents. The data content of the new system is, in general, the same in terms of scope and type as a combination of the old records and text archive.

The new case management system includes a contact database, which stores

- the contact's name and the contact details required to process the case
- the names and contact details of the authorities who are parties to the case or who provide statements and reports due to the case and other actors discharging public duties, whether this data is provided by the people concerned or collected from public sources

Administrative cases brought before 4 January 2016 and cases concerning the oversight of legality brought before 1 April 2016 are processed to completion on the old record system.

Cases brought electronically are stored on the case management system for processing, and the data received at the [oikeusasiatamies@eduskunta.fi](mailto:oikeusasiatamies@eduskunta.fi) email address is erased at regular intervals.

## **6. Regular data sources**

The data sources for complaints include the complainant, reports and statements from the authorities and the Population Information System. Other data sources related to the oversight of legality and the administration of the Office are also used.

## **7. Regular disclosure of data**

The Office of the Chancellor of Justice has direct access to the records of the Office of the Parliamentary Ombudsman on the basis of an agreement concluded to implement section 3 of the Act on the Division of Duties between the Office of the Chancellor of Justice and the Office of the Parliamentary Ombudsman (1224/1990).

## **8. Transfer data outside the EU or EEA**

Data is not transferred outside the EU or the European Economic Area.

## **9. Principles for protecting the register**

### **A. Manual material**

The record cards (for the period from 1947 to 1991) are stored in the archive. The record cards are arranged in alphabetic order by year. The record sheets (for the period from 1947 to 1988) are stored in a locked archive facility. The record books (for the period from 1920 to 1946) are stored in the archive. The cards arranged according to the complainant's name are stored in the archive.

## B. Information stored electronically in the old record and text archive

Letters concerning interim orders related to complaint documents are stored in a record protected using personal user accounts and passwords, and the decision is stored in the text archive on the Parliament's information system, which is password-protected.

## C. Case management system since 4 January 2016

The new case management system, including software, databases and content, is located in the Parliament's own data centre. The case management system can be accessed by users belonging to the staff of the Office of the Parliamentary Ombudsman via integration with the access right management system (AD) within the limits of the access rights granted to such users on the system and within the scope of their specified positions. The suppliers who maintain the Parliament's information systems manage the system's technical environment and its maintenance, but they do not process any data stored on the system.

In line with the Office's rules of procedure, the processing of individual cases concerning the oversight of legality involves the principal legal adviser on the case, the inspector or notary assisting the adviser, and the person issuing a decision on the case. The principal legal adviser, the inspector or notary assisting the adviser, and the person issuing a decision have the right to modify the content related to the handling of the case, including the content of the case and the related documents.

The office personnel assisting the principal legal advisers and decision-makers in work related to the oversight of legality are entitled and obliged to process content related to the case in respect of their working duties.

Besides the expressly stated exceptions, personnel of the Office in positions of public liability are entitled to view all information related to the handling of cases concerning the oversight of legality, including the contents of cases and documents and the associated metadata.

The personnel of the Human Rights Centre have a corresponding right to process their own cases and view the public information of the Office of the Parliamentary Ombudsman.

## **10. Right of access**

Everyone is entitled to know which types of data that concern them are being stored in the records or case management system of the Office of the Parliamentary Ombudsman.

Subject access requests should be made in writing to:

Office of the Parliamentary Ombudsman  
Arkadiankatu 3, 00102 Eduskunta, Helsinki, Finland  
Email: [oikeusasiat@eduskunta.fi](mailto:oikeusasiat@eduskunta.fi)

The subject access request should include the information necessary to search for the data: the name and contact details required to identify the individual.

The request can also be made in person on the controller's premises.

## **11. Right to demand rectification of data**

Everyone is entitled to demand the rectification of incorrect data stored on a personal register. The request should include the information necessary to search for the data: the name and contact details required to identify the individual. Rectification requests should be made in writing to:

Office of the Parliamentary Ombudsman  
Arkadiankatu 3, 00102 Eduskunta, Helsinki, Finland  
Email: oikeusasiamies@eduskunta.fi

## **12. Other rights related to the processing of personal data**

The data on the records and case management system used by the Office of the Parliamentary Ombudsman is not disclosed for commercial purposes.