

Travel Survey 2018 Privacy Statement

Date of compilation: 8 August 2018

1. Controller of the data file

The controller of the data file is Helsinki Regional Transport Authority (hereinafter HSL) (business ID 22745863).

The contact person for matters related to the data file is Research Specialist Pekka Räty.
The director responsible for the survey is Director of Department Sini Puntanen.

HSL's Data Protection Officer is Administrative Director Antti-Pekka Röntynen.
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2. Name of the data file

The name of the data file is Travel Survey 2018.

3. Purpose of the processing of personal data

HSL is responsible for drawing up the Helsinki Region Transport System Plan (Act on Cooperation Between Municipalities in the Helsinki Metropolitan Area in Waste Management and Public Transport (829/2009). The transport system plan is developed as part of the Helsinki Region Land Use, Housing and Transport Plan (MAL), as agreed by the Helsinki region municipalities and the State. The main purpose of use of personal data in the Travel Survey is to implement this HSL's duty. Helsinki region municipalities include Espoo, Helsinki, Hyvinkää, Järvenpää, Kauniainen, Kerava, Kirkkonummi, Mäntsälä, Nurmijärvi, Pornainen, Sipoo, Tuusula, Vantaa and Vihti. In addition, the survey includes Siuntio, which became part of the HSL area on 1 January 2018.

The preparation of the transport system plan requires reliable information about residents' travel habits: how much people travel, where their journeys come from and go to, what modes of transport they use and what kind of variation there is in people's travel habits between different areas and population groups. In addition, forecasts on how people's travel needs are likely to change in the future are needed to support planning. The Travel Survey 2018 examines the travel habits of Helsinki region residents over 7 years of age. The survey results provide essential information for the preparation of the Helsinki Region Transport System Plan, as well as for the management and development of traffic forecast models at HSL.

4. Legal basis for processing

The legal basis for processing the personal data collected in the Travel Survey is public interest (GDPR Article 6/1e).

5. Content of the data file

Data subjects comprise of persons who have been selected for the population sample of the Travel Survey 2018.

The Travel Survey 2018 data file consists of three subsets comprising different types of personal data. The subsets are *sample data*, *survey data* and *prize draw data*. The data or types of data included in each of the subsets and their purposes of use are listed below. Direct identification information are marked with an asterisk (*).

1. **Sample data:** data needed to contact the sample persons.

- Data obtained from the Population Register Centre: name*, address*, code of the place of residence*, location coordinates of the building*, mother tongue, gender, date of birth; in case of sample persons aged 7-14 years, the name* and mother tongue of a guardian (primarily mother) living in the same apartment
- Data obtained from the data files of Asiakastieto Oy and Fonecta Oy: phone number(s)*; in case of sample persons aged 7-14 years, the guardian's phone number(s)*
- The sample data is used for sending invitations to the sample persons, for conducting telephone interviews and for reporting response rates by population group.

2. **Survey data:** the respondent's answers to the survey

- Background information: gender, age, age groups of household members, level of education, main type of activity, mother tongue, dwelling type, home address*
- Travel habits: frequency of use of different modes of transport, driving license and car ownership, possession of a public transport ticket
- Use of mobility services during the past 4 weeks: route and map services, mobile tickets, ride booking, home delivery services, car sharing and borrowing a car
- Journeys during the survey day: addresses* and types of departure place and destination, departure and arrival times, modes of transport used, journey length and smoothness of travel; for car journeys, the number of passengers, use of Park & Ride and charges for parking
- The survey data is used for the management and development of traffic forecast models by HSL as well as for studying the travel habits of Helsinki region residents.

3. **Prize draw data:** respondent's contact details for the prize draw

- Name* and email address* or phone number*
- The prize draw data is used for the prize draw for respondents (3 gift vouchers) and for contacting the winners.

The storage periods of the personal data included in the subsets are set out in section 8.

Responding to the survey is voluntary and there are no consequences for those selected for the sample for not responding. The survey only collects data that are necessary for the purposes of the Travel Survey and are of appropriate accuracy. Responses will not be used in conjunction with information derived from any other sources, such as HSL's internal or external data files.

The respondents are asked to provide the exact addresses of their place of residence as well as the places of departure and destinations of their journeys in order to convert the location data to form new area divisions in the traffic forecast model as the transport system plan and land use change. At the beginning of the data analysis phase at HSL, all address data provided by the respondents will be pseudonymized, i.e. converted into coordinate data.

Travel data of children aged 7 years and over are collected because transport system planning must also take into account children's travel habits and needs. Sample persons aged 7-14 years are contacted via their guardians, allowing the guardian to decide whether or not a child will participate in the survey. Respondents under 18 years of age are asked to provide less information than respondents aged 18 years and over.

All studies conducted using the Travel Survey data are statistical. The studies are not interested in individuals but in various statistical measures, such as averages, distributions and their variance across areas and population groups. The survey results will be presented in various tables and graphs. Individual answers or respondents cannot be identified.

6. Processors of personal data

In its role of controller, HSL is responsible for the design of the Travel Survey, analysis of survey data, reporting of survey results and for the use of survey data for traffic forecast models. Data collection for the survey has been outsourced as follows:

- Feelback Oy finds the sample persons' phone numbers (with Asiakastieto Oy as subcontractor), prints and mails the covering letter and other material to the sample persons (with Grano Oy as subcontractor), conducts the phone interviews for the survey, provides support to respondents and monitors the amount and quality of survey data accumulated.
- Frantic Oy implements the user interface of the online survey
- Dimenteq Oy (nowadays part of Sitowise Oy) implements the survey database, into which the responses are saved.

Feelback Oy, Frantic Oy and Dimenteq Oy process personal data on behalf of HSL. Individuals processing personal data at HSL or at the companies acting on behalf of HSL have been specifically designated.

7. Regular sources of information

The population sample for the Travel Survey is obtained from the Population Information System of the Population Register Centre (decision VRK/45142/2017-2). The sample persons' phone numbers are obtained from the data files of Asiakastieto Oy and Fonecta Oy. The data included in the survey data as well as the contact details for the prize draw are provided by the respondents.

8. Personal data storage period

The personal data in the Travel Survey 2018 data file will be stored as follows (for descriptions of subsets, see section 5):

1. **Sample data** will be erased in March 2019 when the data collection for the Travel Survey has been completed and the quality assessments of the data collected have been made. Both the data of respondents and those who have not responded will be erased. After this, the data file will not contain any personal data of those who have not responded to the survey.
2. **Survey data** will be stored by HSL until the end of 2033, after which it will be anonymized and archived by HSL.
 - In the development of traffic forecast models, it has been noted that one-year survey data is not always enough for estimating the various elements of the model. Thus, it is sometimes necessary to combine the survey data from subsequent years (e.g. data from three subsequent surveys) to ensure the adequacy of observations. As the aim is to conduct the Travel Survey about every five years, the survey data from the Travel Survey 2018 will be needed for the purposes of traffic model development for about 15 years, i.e. until the end of 2033.
 - The survey data will be anonymized and archived at HSL's Transport System and Research Department by the end of 2033. In the anonymization process, some respondent information

will be erased from the data and the data will be irreversibly scrubbed for any information that may serve as identifier of a respondent.

3. **Prize draw data** will be erased after the prize draw in December 2018.

9. Recipients of personal data and regular disclosure of data

Personal data are not regularly disclosed to any third parties.

HSL processes the personal data itself and utilizes service providers processing personal data on behalf of HSL. Service providers are used, for example, for examining and analyzing the survey data. Personal data are transferred to service providers acting on behalf of HSL in accordance with data protection principles agreed by HSL and the service provider.

In individual cases, HSL can disclose survey data to the Helsinki region and HSL area municipalities, State transport authorities, research institutions and universities for the purposes of statistical, scientific or historic studies relating to Helsinki region residents' travel and traffic, as well as for planning and studies by authorities. The data disclosed shall not include direct identification information obtained from the Population Register Centre, Asiakastieto Oy or Fonecta Oy; the data shall only contain information provided by the respondents themselves. In the data disclosed, address information has been pseudonymized by replacing them with coordinate data or with less specific area information in order to minimize the possibility of identifying individuals.

The disclosure of survey data requires that the transferee draw up a research plan outlining the purposes of use of the data and that the transferee has a legal basis for the processing of personal data. An agreement will be signed between HSL and the transferee setting out the terms of disclosure. The transferee shall become the controller of the disclosed survey data.

10. Transfer of data outside the European Union or the European Economic Area

No personal data is transferred from the data file to outside the European Union or the European Economic Area.

11. Principles of data security

The data of the data subjects is secured as follows:

1. The controller and other processor of the data file have agreed on the way the data is secured.
2. The controller's employees and other personnel have undertaken to maintain professional secrecy and the confidentiality of the data they have obtained in connection with the processing of personal data.
3. The processors of the data file manage the data file and related storage of data in accordance with good data processing practice and are subject to strict professional secrecy.
4. The security of the data file and confidentiality of personal data is ensured through appropriate technical and administrative measures in accordance with good data processing practice.
5. The controller has restricted the access rights and authorizations to data systems and other storage platforms, so that only the personnel required for the legal processing of the data is able to view and process it. Only employees whose duties involve processing data are authorized to use the data including personal data. Every user logs into the system with personal credentials provided in connection with granting access rights to the system. The access rights will expire when the person is no longer responsible for the tasks for which they were granted.

6. The data is compiled into logically and physically secured databases. The databases and their backups are located on locked premises, and only designated personnel are permitted to access the data.

12. Rights of the data subject

During the data collection for the Travel Survey 2018 (27 August-7 December 2018) the respondents can review the data relating to them included in the survey data. During the data collection, the respondents are identified on the basis of their name, contact details and username. Once the data collection is completed, all respondents' names, contact details and usernames will be erased so that it will not be possible to reliably identify individual respondents from the data.

Data review requests shall be addressed to the controller in accordance with the instructions available at www.hsl.fi/privacy.

Because the Travel Survey is a scientific study, in which the basis for the processing of personal data is a public interest duty, the rights of the data subject are limited. The data subject has the right to file a complaint with a supervisory authority (Office of the Data Protection Ombudsman, switchboard: +358 29 566 6700, email: tietosuoja@om.fi), if the data subject considers that the processing of his or her personal data is in violation of the EU's General Data Protection Regulation (GDPR Article 77).

13. Amendments

HSL can make amendments to this Privacy Statement by announcing the changes on the Travel Survey website at www.hsl.fi/travelsurvey2018.