Record of processing activities

This Privacy Statement describes, in accordance with the <u>General Data Protection Regulation (EU)</u> <u>2016/679</u>, how the Bank of Finland/Financial Supervisory Authority (FIN-FSA) processes the personal data of data subjects stored in this personal data file system and the rights of the data subjects.

1. Name of the personal data file system

Risk system

2. Name and contact details of controller and contact details of data protection officer

Financial Supervisory Authority Business ID 0202248-1 PO Box 103 00101 Helsinki

Contact details of the person responsible for the personal data file system:

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Contact details of the data protection officer:

Pasi Hänninen

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3. Purpose of the processing of personal data and the legal basis for the processing

The supervised entities of the Financial Supervisory Authority (FIN-FSA) report to the FIN-FSA data on their financial status and risks. Reporting is used to monitor the financial status and risks of the supervised entities and to analyse profitability, solvency, risks and operating volumes.

The reports are stored in the Risk system. The reports also provide information about the supervised entity's contact person, who can be contacted if something needs to be clarified in respect of a report. The name, telephone number and email address of the contact person are stored in a database.

The following reporting includes personal data:

- 1. Reporting of large exposures (COREP LE). Exposure, i.e. a monetary receivable related to a person or company. Data collection is based on section 18 of the Act on the Financial Supervisory Authority (878/2008) and on Article 394 of the EU Capital Requirements Regulation (Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, CRR).
- 2. Reporting on the state of the banking system (S) is based on the FIN-FSA Regulations and Guidelines 1/2014.
- 3. Additional monitoring metrics for liquidity reporting (COREP ALM) reporting is based on the FIN-FSA Regulations and Guidelines 26/2013.
- 4. Reporting of largest counterparties (V) is based on the FIN-FSA Regulations and Guidelines 26/2013.
- 5. Reporting of semiannual data on pension insurance (VO) is based on the FIN-FSA Regulations and Guidelines 1/2011.
- 6. Solvency 2 reporting (S2) is based on Directive 2009/138/EC of the European Parliament and of the Council of 26 November 2009.

4. Categories of data subjects and categories of personal data

The reporting mentioned in the previous section includes the following personal data:

- 1. Reporting of large exposures (COREP LE) includes personal data such as a person's name, personal identification number and the amount of the receivable.
- 2. Reporting on the state of the banking system (S) includes personal data such as a person's name, personal identification number, the euro amount of the non-performing receivable from the person or the connected group of clients' total liability.
- 3. Additional monitoring metrics for liquidity reporting (COREP ALM) reporting includes personal data such as a person's name, home country and amount of debt.
- 4. Reporting of largest counterparties (V) includes personal data such as a person's name, personal identification number, domicile, economic activity, group or individual customer, and original purchase value.
- 5. Semiannual data on pension insurance (VO) includes personal data such as an entity's or object's name, the fair value of investments and related technical provisions coverage.
- 6. Solvency 2 data collection (S2) includes personal data such as a person's name and the amount of receivable from the person.

5. Recipients or categories of recipients of the personal data

The FIN-FSA discloses data to the European Central Bank, the European Banking Authority, the European Insurance and Occupational Pensions Authority, the European Securities and Markets Authority, the Financial Stability Authority, Statistics Finland, the Finnish Centre for Pensions, the Social Insurance Institution of Finland and the International Monetary Fund.

The Bank of Finland also discloses Solvency 2 data to the ECB.

The ECB discloses data received from the FIN-FSA to the European Banking Authority.

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

Data may be disclosed to the International Monetary Fund (IMF).

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

Personal data is stored for 20 years. The data are deleted when their storage period has ended.

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. These measures include the use of secure equipment premises as well as administrative and technical information security solutions.

9. Rights of data subjects

The reported data are collected on a statutory basis, applying Article 14 Paragraph 5 C of the General Data Protection Regulation.

Data providers have the right to have rectified an error in data relating to them. A request to rectify an error must be sent in writing and the request must be signed by the data provider. A request for rectification is addressed to the contact person of the personal data file system.

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

See section 3 subsections 1-6 above.

11. Source of information

The personal data have been obtained from data reported by credit institutions supervised by the FIN-FSA and the European Central Bank as well as by credit institutions, insurance and pension companies, investment firms and fund management companies supervised by the FIN-FSA (see sections 3 and 4).