Privacy Policy

Nodeon Finland Oy (hereafter “the Company”) has committed to respecting the applicable data protection and privacy legislation. In this Privacy Policy the Company describes, how it collects, uses, stores and protects personal data in relating Companies “Traffic flow measurement and analysis” product and its vehicle identification database.

This Privacy Policy is last updated on 4.9.2019.

We will update this Privacy Policy, if necessary, as our operations and services develop. Updates are published in the Privacy Policy available in our website, under Traffic flow measurement and analysis services. We advise you to check for the latest version regularly on our website. Latest version is also available from the Company upon separate request.

If there is a conflict between translations, the Finnish version shall prevail.

1. Data Controller
Nodeon Finland Oy, Piippukatu 11, 40100 Jyväskylä, Finland
Business ID: 2538755-5

2. Contact person for the Data Controller
Timo Majala, timo.majala@nodeon.com, +358 40 751 1790
Contact person is not a DPO referred to in data protection legislation.

3. Name of the register
Vehicle identification database

4. The Company’s role as Data Controller
Nodeon Traffic flow measurement and analysis is a productised service (hereafter “the Service”) of the Company, which the Company produces to its customers (hereafter “the Customer”).

While delivering the Service, the Company determines the purposes and means for processing of personal data and furthermore determines, what personal data is collected, where the data is processed and retained, and what are the actual purposes of using the data. Company’s Customers do not define the purposes and means for the personal data processing, and they do not have any authority for the data processing, nor do they have access to personal data. Therefore, the Company is the controller of data.

Hereunder we describe in more detail, for what purposes the Company processes the personal data.
5. The legal basis and purpose of personal data processing

The purpose of processing personal data relating the delivery of the Service is to measure and analyse traffic flows. It is performed by identifying vehicle license plates from the traffic flow by using license plate recognition cameras (LPR) and by combining license plate information to the public data (national car registration database).

Identified vehicles together with public data form a statistical database, which serves as a basis for forming analysis for Customer’s needs or other scientific research.

By using this statistical database, the Company provides the following analysis to its Customers:

- Traffic volume analysis
- Traffic flow origin analysis in county/municipality/postal code level (based on vehicle registration place)
- Versatile classification services relating recognized vehicles (number of different vehicle types, number of vehicles in different CO2 emission classes, motive power classification, age and car manufacturer analysis)

Customers uses these analyses typically for statistical and analytical purposes, such as traffic system planning, long-term monitoring of the changes in the traffic flows and for development projects’ impact assessment (before-and-after analysis). The data may also be used for the purposes of analysing the customer flow origin areas.

Remarks relating personal data processing:

- Camera identifies license plate information automatically from a video image (the Company does not store any kind of image material about the vehicles or the passengers)
- License plate information is transmitted from the recognition camera to the Companies cloud services by using protected connection (SSL)
- The Company does not disclose or transfer license plate information or any other personal data to the Customer
- Based on vehicle license plate information, no other personal data is solved from the public data source like person ID’s, names or addresses.
- The Company itself uses personal data (license plate information) only to form above mentioned analysis.

The Company processes personal data for the purposes of producing agreed services to its Customers based on a contract with the Customer. In addition, a legal justification for data processing is the data controller’s legitimate interest, as the Company is performing actions related to its business and in ensuring the quality of its services.

6. The type of personal data

The statistical database contains the following information: timestamp of vehicle identification, location data, vehicle license plate information (pseudonymized), vehicle’s origin area by region, municipality and postal code, vehicle’s class, motive power, make and model, registration year and colour.
Vehicle’s registration mark will be stored pseudonymized during each measuring project or in accordance with the contract between the Customer and the Company, after which the registration mark will be anonymized and stored for statistical purposes.

7. Regular data sources
The data is collected from the traffic flow by camera images of vehicles registration mark, as described in clause 5. For this, solution will combine relevant information received through an interface of Finnish Transport and Communications Agency (Traficom).

8. Transfer of personal data outside EU/EEA
The Company does not disclose the personal data to third parties. The Customer will have a limited right of use the database produced by the measurement, which does not contain vehicle registration marks or any other personal data. Other than personal data may be published as separately agreed with the Customer.

The data will not be transferred outside the EU/EEA.

9. Retention period
The Company anonymizes vehicle registration marks processed in the vehicle identification database right after the corresponding information has been received through an interface of Finnish Transport and Communications Agency (Traficom). Hence, the data retention period of the vehicle registration marks is in maximum certain months from the date of identification.

10. Principles of safeguarding the data
The Company uses a high degree of care in data processing and ensures that the data which is processed in data systems is appropriately protected. If the registration data is stored in Internet-servers, their physical and digital data security will be duly protected. The Company ensures that any stored data, user rights to servers and other critical information will be processed in confidence and only by the personnel who need to process the data for the purpose of performing their working duties.

11. Right to access the data and right to rectification
Every data subject has a right to know whether the Company processes his or her personal data and right to request the Company to rectify any inaccurate personal data and to complete any incomplete data, during the retention period set forth in clause 9. Should a data subject want to use such rights, all requests mentioned herein must be provided in written form to the Company. The Company may need to identify the data subject and ask for additional information. The Company will respond to requests within the time period set forth in the General Data Protection Regulation 2016/679 (“GDPR”) (within a month, in general).
12. Other data subject rights

Data subject has a right to request erasure of personal data from the register ("right to be forgotten") in accordance with the criteria set forth in applicable legislation, for example when the personal data is no longer required for the original purposes or the personal data has been processed unlawfully. Data subject also has other data subject rights set forth in the GDPR, such as the right to request from the controller restriction of processing of personal data in certain situations or otherwise object to processing. Requests must be made in written form. The Company may need to identify the data subject and ask for additional information. The Company will respond to requests within the time period set forth in the GDPR (within a month, in general).

Whether the data subject finds the processing of his or her personal data unlawful, he or she has the right to lodge a complaint with a supervisory authority.