

Register description

EU General Data Protection Regulation (2016/679)

14 November 2025

Personal data register of call recordings from control centres and other call recordings critical to road safety

1. Controller

Metropolitan Area Transport Ltd, business ID 3251002–1, (hereinafter also referred to as 'Metropolitan Area Transport') or together with its subsidiaries ('Metropolitan Area Transport Group').

2. Person in charge of the register

Job title

Control Centre Managers according to their areas of responsibility

Maintenance HSEQ Manager

3. Contact person for the register

Job title

Control Centre Managers or people separately assigned by them

Safety Manager or a person separately assigned by them

Contact information

PO Box 100, 01022 Kaupunkiliikenne

4. Purposes of processing personal data and legal basis for the processing

Purposes of processing

The register collects the information necessary for the Metropolitan Area Transport Group to carry out the supervision related to its safety management system, to monitor and



develop road safety and to investigate incidents and accidents in its activities to prevent the occurrence of future incidents and accidents.

Legal basis for the processing

Point (c) of Article 6(1) of the EU General Data Protection Regulation. The processing is necessary for compliance with a legal obligation to which the controller is subject. Special categories of personal data may need to be processed in situations where processing is permitted under Article 9(2)(c) (the data subject is physically or legally incapable of giving consent) and/or (f) (processing is necessary for the establishment, exercise or defence of legal claims) of the EU General Data Protection Regulation (2016/679).

Relevant legislation

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Raideliikennelaki (1302/2018) (Rail Traffic Act)
- Act on the Protection of Privacy in Working Life (759/2004)
- Safety Investigation Act (525/2011)
- Act on Transport Services (320/2017)

Additionally

- Kaupunkiraideliikennemääräys (TRAFICOM/52247/03.04.02.00/2023) (Regulation on urban rail transport)

5. Information content of the register

Categories of data subjects: employees, customers, third parties.

The following data regarding the data subject are recorded in the register either fully or partly:

- Number called from
- Number called
- Call recordings and the information they contain (voice, issues discussed during calls)
- Any additional information recorded in the system
- Internal Elisa Ring data concerning Metropolitan Area Transport staff
- Call start and end time, duration, date
- Driver information



6. Statutory disclosure of personal data

The information will be disclosed to the police and/or other authorities investigating crimes and/or accidents and to the emergency services. The recordings will be used internally within the Metropolitan Area Transport Group to carry out controls related to the safety management system, monitor road safety and investigate accidents in order to prevent similar incidents. The recordings contained in the register may be used internally within the Metropolitan Area Transport Group for educational purposes.

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

7. Data retention periods

As a general rule, recordings are kept for one (1) month.

If the recordings are needed to investigate accidents, crimes or incidents, the recordings are kept for as long as necessary for the investigation. Even after this, the recordings may be used in the Metropolitan Area Transport Group's internal safety management system to avoid similar accidents and incidents.

8. Information sources for personal data

The system automatically starts recording the call when the call is initiated. The phone number is stored in the system when the call is forwarded to a number to be stored.

