The Finnish Immigration Service register of payment cards held by asylum seekers

Controller

Primary controller:
Prepaid Financial Services Ltd. (PFS)
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302-308 Regent Street
London
W1B 3AT
UNITED KINGDOM

National sub-register:
Finnish Immigration Service
Postal address: PO Box 10, 00086 Maahanmuuttorasto
Head Office: Opastinsilta 12 A, Helsinki
Telephone: +358 (0)295 430 431 (switchboard), fax +358 (0)295 411 720
E-mail: migri@migri.fi

The sub-register of the reception centre:
The reception centre in question (enter the contact details of the reception centre)

Contact details in matters concerning the register

National sub-register:
Finnish Immigration Service, Reception Unit
Telephone: +358 (0)295 430 431 (switchboard) or migri@migri.fi

The sub-register of the reception centre:
The reception centre in question
(enter the contact details of the reception centre)

The data protection officers of the controller

Primary controller:
x

National sub-register:
Data Protection Officer of the Finnish Immigration Service
Postal address: PO Box 10, 00086 Maahanmuuttorasto
E-mail: tietosuojavastaava@migri.fi
Website: www.migri.fi
Purpose and legal basis of the processing of personal data

The payment card is provided for use to a person who is seeking international protection, receiving international protection or a client of the Assistance system for victims of human trafficking (cardholder) and their spouses of similar status for the purpose of paying the reception allowance, spending money or earnings.

The purpose of processing personal data in this register is to manage the payment card issued by the reception or registration centre or the detention unit to the asylum seeker or detainee and the related measures. The register of payment cards issued to asylum seekers is a register in which the necessary information about payment cards and cardholders issued by Prepaid Financial Services Ltd (PFS) are stored.

The payment card register includes the card management system, the cardholder's online service, the cardholder's automated telephone service as well as the card monitoring register and card receipt forms used at the reception or registration centre. In addition, the payment card register contains the user credential and authentication register as part of the payment card management system and the register used for sanctions list checks.

Only the information that is necessary for the purpose of the register is stored in the payment card register and it is used for

- the identification and authentication of cardholders (data subjects) in connection with the issuance, management and cancellation of a payment card
- the payment of the reception allowance, spending money or earnings
- normal monitoring of the payment card use
- possible investigations into suspected misuse of a payment card
- statutory sanctions list checks
- steering, planning and monitoring the operations of the reception system as well as in producing national statistics

The processing of personal data is based on compliance with legal obligation of the controller under Article 6 (1) (c) of the General Data Protection Regulation. A legal obligation of the controller is based on the following Acts:

- Act on the Processing of Personal Data in the Field of Immigration Administration (615/2020)
- Act on the Reception of Persons Applying for International Protection and on the Identification of and Assistance to Victims of Trafficking in Human Beings (746/2011)
- Act on the Treatment of Detained Aliens and on Detention Units (116/2002)

In addition, the primary controller (PFS)

- collects, processes and analyses data on the use, traffic and transactions of the online service provided by PFS and used by the cardholder. Data on the online traffic may be linked with persons visiting the website and used for transmitting, distributing and sending
messages via information networks. The data is not used for identifying individual users.
• For more information, see the PFS Privacy Policy attachment

Categories of personal data

The payment card register contains the following information about a cardholder:
• date of birth
• Finnish Immigration Service client number
• the name and/or locality of the registering reception centre
• e-mail address (optional information, information given at data subject’s discretion)
• information about earnings and/or name of the employer and the employer's bank account number
• information about possible entry on a sanction list
• the IP address of the network connection used by the card holder
• card information and the information of the virtual account linked to it
• account transactions
• information related to the cardholder’s use of the online service and automated telephone service
• other necessary information related to the customer relationship and payment card services
• information related to the payment of the reception allowance

Sources of information

The data in the register of payment cards issued to asylum seekers are received from
• the primary controller regarding normal payment card authentication data
• the reception client register regarding cardholder’s personal information
• the reception centre for asylum seekers regarding the activation of payment card and information related to possible employment contracts
• Suomen Asiakastieto regarding sanctions list check results
• the cardholder themselves regarding information related to possible employment contracts
• from the employer of the cardholder regarding the employer’s bank account number
• the cardholder themselves regarding the cardholder’s e-mail address

Recipients of personal data

The personal data of the data subject may be disclosed only with the consent of the cardholder, which is requested from the data subject on issuing the payment card. The recipients of personal data regarding the register of payment cards issued to asylum seekers are:
• Reception and registration centres for asylum seekers
• Finnish Immigration Service, Reception Unit
• Finnish Immigration Service, E-services Unit
• Suomen Asiakastieto Oy
• Prepaid Financial Services Ltd. (PFS)

In addition, personal data may be disclosed upon request to public authorities or other bodies that are legally entitled to the data held in the register. The person requesting the data must indicate the legal provision under which the data may be requested.
Transfer of personal data outside the EU/EEA

Personal data may also be transferred outside the EU/EEA by the primary controller. For more information, see the PFS Privacy Policy attachment.

Retention period of personal data

The data in the register of payment cards issued for asylum seekers are retained for six years after the deactivation of the card. Data related to financial transactions, accounts or payment cards cannot be deleted due to the national laws applicable in the country of domicile of PFS relating to the prevention of fraud, money laundering, anti-terrorist financing activities or criminal misconduct.

The payment card data of the data subject in the reception client register will be erased when the personal data are no longer necessary in relation to the purposes for which they are collected and no later than five years after the last entry concerning the data subject. The erased data will be archived in its entirety for permanent storage in electronic format only, as provided in the decision of the National Archives Service.

Right of access to personal data

The data subject has the right upon request to receive stored and processed personal data concerning him or her or a confirmation that personal data concerning him or her is not being processed. The information request is sent in person to the controller as follows:

- by visiting the reception centre in person
- or by sending the information request by mail to the Finnish Immigration Service
- or by sending the information request by e-mail to migri@migri.fi

The right of access may be denied under exceptional circumstances only. If the controller refuses to provide access to the data, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. A failure by the controller to give a written response to the data subject within three months of the request is deemed equivalent to a refusal to provide access to the data. In this event, the data subject may bring the matter to the attention of the Data Protection Ombudsman.

The controller may charge a reasonable fee for the provision of access to the data if less than one year has passed since the previous instance of exercising the right of access.
Right to rectify or supplement personal data

The data subject has the right to request the controller to rectify, erase or supplement personal data contained in the register if it is erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing. In this event, we will ask you to specify what information is incorrect and how and why it should be changed, or to specify what information should be added and in what way.

The request to rectify, erase or supplement personal data is sent in person to the controller as follows:

- by sending the information request by mail to the Finnish Immigration Service
- or by sending the information request by e-mail to migri@migri.fi
- or by visiting the reception centre in person

Report on the processing of personal data and the right to file a complaint with a supervisory authority

If you wish to report a problem concerning the processing of your personal data, please first contact the representative/data protection officer (contact details above) of the controller. Data subjects have the right to file a complaint about the processing of their personal data to the supervisory authority. In Finland, the Data Protection Ombudsman functions as the supervisory authority. The website of the Office of the Data Protection Ombudsman is at www.tietosuoja.fi.

Other possible rights of the data subject

You may request for your funds remaining on a deactivated card to be paid to you from the Finnish Immigration Service or the reception centre for six years after the card is deactivated. You will no longer be able to access the funds remaining on the card after six years from the deactivation of the payment card.

Enclosures

Privacy Policy (Prepaid Financial Services Ltd.)

The updated privacy statement is available on the website of the Finnish Immigration Service www.migri.fi