



# GDPR, as It Happened in the National Library of Finland

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Digitaalne mälu / Digital Memory  
Tallinn 25.4.2019



KANSALLISKIRJASTO



<http://urn.fi/URN:NBN:fi-fe2019041512372>

# The Previous 1999 Act Was Not That Different

**Broad definition**      **Subjects' Rights First**

**Necessity**      **Correctness**      **Planning**

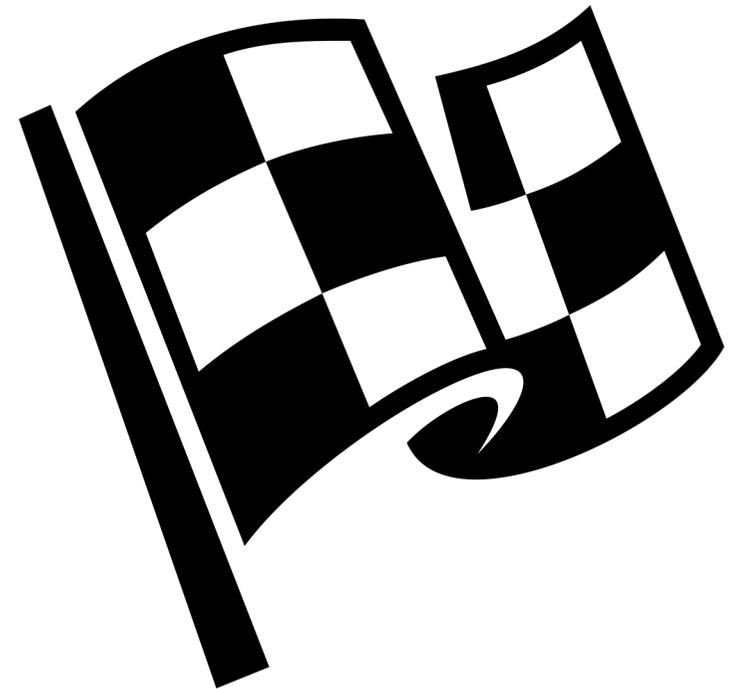
**Privacy Notices**      **Sensitive Data Guards**

# Then We Got This

The processing of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security and the free movement of such data, is the subject of a specific Union legal act. This Regulation should not, therefore, apply to processing activities for those purposes. However, personal data processed by public authorities under this Regulation should, when used for those purposes, be governed by a more specific Union legal act, namely Directive (EU) 2016/680 of the European Parliament and of the Council <sup>(7)</sup>. Member States may entrust competent authorities within the meaning of Directive (EU) 2016/680 with tasks which are not necessarily carried out for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and prevention of threats to public security, so that the processing of personal data for those other purposes, in so far as it is within the scope of Union law, falls within the scope of this Regulation.

With regard to the processing of personal data by those competent authorities for purposes falling within scope of this Regulation, Member States should be able to maintain or introduce more specific provisions to adapt the application of the rules of this Regulation. Such provisions may determine more precisely specific requirements for the processing of personal data by those competent authorities for those other purposes, taking into account the constitutional, organisational and administrative structure of the respective Member State. When the processing of personal data by private bodies falls within the scope of this Regulation, this Regulation should provide for the possibility for Member States under specific conditions to restrict by law certain obligations and rights when such a restriction constitutes a necessary and proportionate measure in a democratic society to safeguard specific important interests including public security and the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security. This is relevant for example in the framework of anti-money laundering or the activities of forensic laboratories.

# The Last Mile: Showing and Telling, Not Just Telling.



# 2017

”Those are very good questions, and you must answer them yourselves.”



# 2018

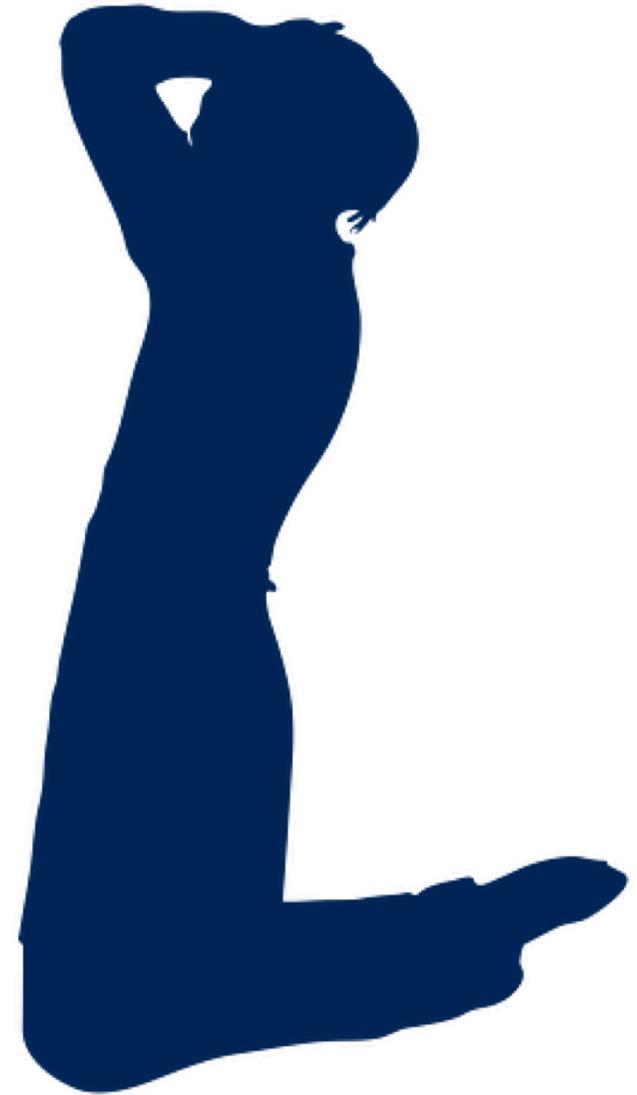
We got help  
and answered  
the questions  
ourselves.





# 2019

We realized  
We must answer  
the questions  
again. And again.



# Supported by the University

- Data Protection Policy
  - Roles defined
  - Instructions & support
  - Legal help
- 
- Also: Data Protection Ombudsman  
<https://tietosuoja.fi/>



^ Nimi	Omistajayksikkö	Omistaja	Pä Te	Merkitys	Käyttötarko	Vaihe	Elinkaaren
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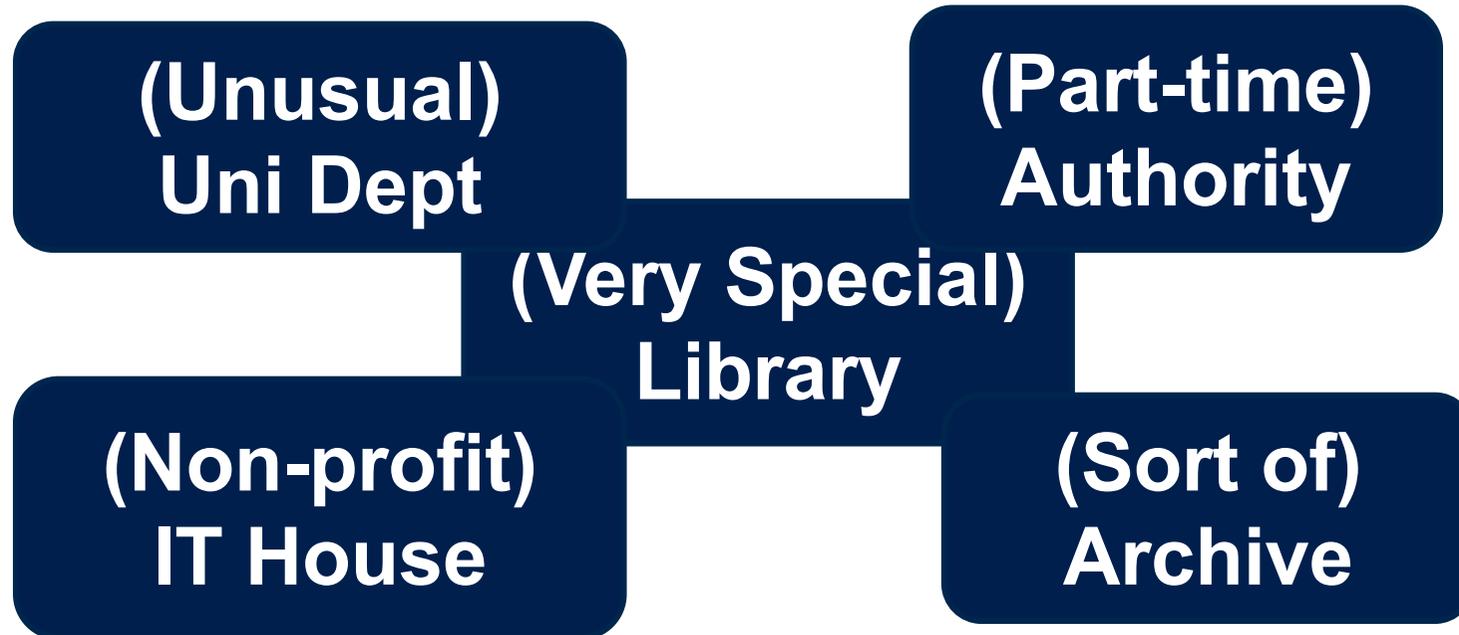


# 2019

We have made  
mistakes.  
We wish we  
learn from them.



# Identity Problem



# Coming Next: Accessibility Directive

where the accessibility requirements set out in this Directive are not applicable, then in accordance with Council Directive 2002/46/EC.

Public sector bodies should apply the accessibility requirements set out in this Directive to the extent that they do not impose a disproportionate burden, where possible and make other content fully accessible. Exceptions to compliance with the accessibility requirements due to the disproportionate burden should be understood as measures that would impose an excessive organisational or financial burden on a public sector body, taking into account the nature and complexity of the tasks and the number of persons with disabilities. Only legitimate reasons should be taken into account in any assessment of the extent to which the accessibility requirements apply to software systems to manage content on websites and mobile applications in an accessible manner, since sufficient and advisable interoperability relating to accessibility should maximise the compatibility of content with current and future user agents and interface components. Interoperability thus benefits the users, allowing them to employ their user agents ubiquitously to access content on websites and mobile applications.

This Directive lays down accessibility requirements for the websites and mobile applications of public sector bodies. In order to ensure consistency, the Commission shall, where appropriate, draw up and publish in the *Official Journal of the European Union* in accordance with Regulation (EU) No 1025/2012, a list of harmonised standards which, in their view, does not entirely satisfy the accessibility requirements laid down in this Directive.

The European standardisation organisations have adopted European standard EN 301 549 V1.1.2 (2015-04), specifying the technical specifications and standards developed in relation to the accessibility requirements set out in this Directive should be based on clauses 9, 10 and 11 of European standard EN 301 549 V1.1.2 (2015-04). Technical specifications and standards developed in relation to the accessibility requirements set out in this Directive should be based on clauses 9, 10 and 11 of European standard EN 301 549 V1.1.2 (2015-04).

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An accessibility statement should be provided by public sector bodies on the compliance of their websites and mobile applications with the accessibility requirements set out in this Directive.

Mobile applications are available from a variety of sources, including private application stores. Information regarding the accessibility requirements set out in this Directive does not require major platform providers to change their application distribution mechanisms, but instead imposes on the public sector bodies to ensure that their mobile applications are accessible.

A feedback mechanism should be set up to enable any person to notify the public sector body concerned of any failures of compliance with the accessibility requirements set out in this Directive, such as office file formats, information, including services and documents. In response to a legitimate and reasonable request, the public sector body concerned should take the necessary measures to raise awareness of, and promote web training programmes relating to, the accessibility requirements set out in this Directive.

[www.nationallibrary.fi](http://www.nationallibrary.fi)

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