

## **In Posti's view, the data protection authority's decision regarding a penalty is excessive - Posti has improved the visibility of the personal data disclosure prohibition in the change of address notification service**

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When submitting a change of address notification, the customer has the option to prohibit the disclosure of their personal data to a third party for the purpose of updating their address. The data protection authority has issued a reprimand in which it remarks that, in its opinion, the information is not adequate. Posti emphasizes that it has acted in a lawful manner in the matter. Posti has also improved the visibility of the personal data disclosure prohibition. Posti plans to appeal the penalty issued by the data protection authority.

Finns make approximately a million house moves each year. Correct and up-to-date address information is critical for the smooth delivery of mail following the move. The person moving house must submit a change of address notification so that items can be directed to the new address. The new address information is updated via the change of address notification service to other service providers, such as insurance companies or trade unions. The customer does have the option to prohibit the update, of which Posti has notified its customers.

Posti's website states that disclosing personal data to service providers is voluntary and that it can be prohibited if the customer so desires. If the person moving house wants to prohibit their personal data from being disclosed, they must personally contact the various service providers to notify them of the new address.

"Finns make approximately a million house moves each year, and usually they are extremely relieved that mail-senders are automatically notified of the new address. Without this free service, the person would

have to personally notify the energy company, insurance company, trade unions and other senders of the change of address. It is testimony to how vital the service is that less than one percent of people moving house prohibit the disclosure of their personal data for the purpose of the update. Up-to-date address information is also important for us at Posti, so that we are able to deliver items as quickly as possible," says Tuija Åkerman, Posti.

### **Posti views the penalty decision as excessive**

Posti already informs its customers of the matter in a variety of ways: in the service terms, on its website and in its privacy statement. Posti complies with the data protection authority's guidelines and is further increasing the visibility of the option to prohibit the disclosure of data.

"Posti has increased the amount and visibility of information on its online service regarding the option to prohibit disclosure. We want to ensure the visibility of the information also in the future so that consumers will find it easy to understand their rights with regard to their personal data. This also benefits Posti. We

have ensured the reliability of personal data processing in several ways. We are making amendments in line with the official guidelines,” says Tuija Åkerman.

When a person moving house orders additional services in connection with submitting the change of address notification, Posti requests that the person specifically approve the terms and conditions of the change of address notification service because the person is then establishing a customer relationship with Posti. A separate approval is not required if the person only submits a change of address notification in the mutual change of address notification service of Posti and the Digital and Population Data Services Agency. However, the terms and conditions as well as the privacy statement are available and visible on the website with regard to the data disclosure prohibition.

Posti is planning to appeal the data protection authority’s decision dated May 18th. The authority has not issued any previous instructions, even though the issue was first raised in 2017. Posti has proactively amended and clarified the phrasing of the privacy statement and increased the visibility of both the privacy statement and the service terms in Posti’s online service.

“In Posti’s opinion, the penalty is excessive for a service, which has had the same content and which has been known to the authorities for several years,” says Tuija Åkerman.

### **The address update service conforms to the Postal Act**

Updating the address register information of persons changing their address is not part of Posti’s core business in an income-earning sense. It is an important way to support, not only the mail recipient, but senders as well as the smoothness of mail delivery to the person’s new address. Updating the person’s address information is conducted in compliance with the Postal Act.

“Pursuant to the Postal Act, we only update the person’s new address to the data files where said person’s data already exists,” explains Tuija Åkerman.

When existing data files are updated, the person may receive direct marketing materials from energy companies, for example. If the person does not wish to receive direct marketing materials, they may prohibit it separately for each company or via the prohibition register of ASML, the Data & Marketing Association of Finland.

Source: [Posti](#)

