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NOTE

From:	Presidency
To:	Ad hoc Group on Information Exchange
Subject:	Prüm/VRD evaluation of Finland
	- Report of the evaluation visit (17-19 March 2010)

The current draft is based on the Finland's replies to the questionnaires and includes the results of the visit, following the evaluation and the drafting session of the evaluation team during the visit.

Version History

Date	Version	Author	Remarks
29-03-2010	0.1	Koen NOTE	Initial version
19-04-2010	0.2	Herman GROOTERS	Amended version
23-04-2010	0.3	Marja KARTILA	Finnish amendments
26-04-2010	1.0	Pierre LEBRUN	1.0 version

Distribution List

Date	Version	To	Remarks
12-04-2010	0.1	Herman GROOTERS	Initial version
12-04-2010	0.1	Christophe DEFREMONT	Initial version
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23-04-2010	0.3	Pierre LEBRUN	Finnish amendments
28-04-2010	1.0	Ad Hoc Group on Information Exchange	Final version

Document approval

Date	Version	Author	Remarks
19-04-2010	0.2	Herman GROOTERS	
19-04-2010	0.2	Christophe DEFREMONT	
23-04-2010	0.3	Marja KARTILA	
26-04-2010	1.0	Pierre LEBRUN	

Management summary

The evaluation visit took place on three sites on Finnish territory: the Communication Centre at the National Bureau of Investigations (in Vantaa), being the National contact point for both incoming and outgoing requests; Haltik, the Finnish Internal Security ICT Agency (in Rovaniemi); and the Rovaniemi police station. Apart from these organizations there were also representatives of the Finnish Transport Safety Agency and the Finnish National Police Board present. Extensive presentations and demonstrations on the system and legislation were given by expert representatives of those organisations. Next to these, delegations from the French user community and from the EUCARIS NPO also participated in the evaluation.

This evaluation report is the joint result of this visit together with the answers received to the two questionnaires and the checklist used by the evaluation team:

- Generic Data Protection Questionnaire (cf. doc. 6661/1/09 REV 1 ADD 1 REV 1)
- Questionnaire on exchange of VRD (cf. doc. 6661/1/09 REV 1 ADD 4 REV 1)
- Evaluation procedure VRD and the Checklist in Annex (cf. doc. 6661/1/09 REV 1 ADD 5 REV 2)

The latter document explicitly tasks the evaluation team to check:

- Whether the correct matches can be found on known data
- Whether the logging system provides information according to art. 30 of the Council Decision 2008/615/JHA
- The business processes.

The Finnish law enforcement authorities took great interest in the work and the findings on the spot of the evaluation team. The members of the evaluation team received all requested information and were able to have direct contacts with representatives of the above mentioned National Contact Point, the Transport Safety Agency, as well as the Internal Security ICT Agency.

The Finnish law enforcement authorities made very considerable progress in implementing the EUCARIS/Prüm-application and the related Prüm/VRD-information flow. However, the evaluation team was able to identify a number of issues that need to be addressed and therefore formulates recommendations in its conclusions. These recommendations relate to **(a)** procedures and guidelines, **(b)** the transposition of certain provisions into Finnish law, **(c)** some technical adaptations and **(d)** protection of log files.

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LIST WITH ABBREVIATIONS

DPA: Data Protection Authority

EAI: Enterprise Application Integration

EUCARIS: European Car and Driving Licence Information System

EUCARIS-NPO: EUCARIS Nominated Party for Operation[1]

NBI: National Bureau of Investigations

NCP: National contact point

NPB: National Police Board

TraFi: Transport Safety Agency

(Vehicle Registration Office)

VRD: Vehicle Registration Data

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[1] The EUCARIS-NPO is a designated organization from one of the parties to the EUCARIS-Treaty dd. 29 June 2000 concerning a European Vehicle and Driving License Information System. Currently, the EUCARIS-NPO is held by the Dutch Vehicle Registration Authority, *i.e.* the RDW *(Rijksdienst voor Wegverkeer)*.

I. INTRODUCTION

1. Council Decisions 2008/615/JHA[2] and 2008/616/JHA[2] (henceforth referred to as the Prüm-Decisions) enable Member States[3] to start off with the automated information exchange in three fields relevant to police cooperation in the EU: DNA, Fingerprints and Vehicle Registration Data (VRD). As laid down in art. 36(1) of Council Decision 2008/615/JHA, Member States shall comply with the provisions regarding DNA, Fingerprints and VRD by 26 August 2011.

2. Further to art. 25(2) of Council Decision 2008/615/JHA and art. 20(2) together with Chapter 4 of the Annex to Council Decision 2008/616/JHA, the Sub Group on VRD – reporting to the Working Party on Information Exchange and Data Protection – is responsible for organizing and carrying out evaluation visits to Member States prior to any actual exchange of VRD taking place as provisioned by art. 12 of Council Decision 2008/615/JHA *(Automated Searching of Vehicle Registration Data)*.

3. The evaluation report at hand applies to **the Republic of Finland** and is the result of close cooperation between the competent Finnish authorities and the designated evaluation team (*i.e.* representatives of the Sub Group on VRD, cf. *infra*: *IV. Participants in the Evaluation Visit*). The purpose of this document is to provide the Council with sufficient and accurate information to enable it to take a decision in accordance with art. 25(2) of Council Decision 20008/615/JHA. The text only reports on the situation as regards VRD and is without prejudice to the Council's decision as regards any other field of information exchange foreseen in the Prüm-Decisions. The report's content is the responsibility of the Sub Group on VRD as a whole.

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[2] Council Decision 2008/615/JHA of 23 June 2008 on the stepping up of cross-border cooperation, particularly in combating terrorism and cross-border crime, *O.J.*, 6 August 2008, L 210/10.

[2] Council Decision 2008/616/JHA of 23 June 2008 on the implementation of Decision 2008/615/JHA on the stepping up of cross-border cooperation, particularly in combating terrorism and cross-border crime *O.J.*, 6 August 2008, L 210/12.

[3] Throughout this text, the notion 'Member States' includes Norway and Iceland. Cf.: Council Decision of 21 September 2009 on the signing, on behalf of the European Union, and on the provisional application of certain provisions of the Agreement between the European Union and Iceland and Norway on the application of certain provisions of Council Decision 2008/615/JHA on the stepping up of cross-border cooperation, particularly in combating terrorism and cross-border crime and Council Decision 2008/616/JHA on the implementation of Decision 2008/615/JHA on the stepping up of cross-border cooperation, particularly in combating terrorism and cross-border crime, and the Annex thereto, *O.J.*, 31 December 2009, L 353/1.

II. LEGAL BASIS

4. The evaluation visits to be carried out as a precondition to actual exchange of VRD in the framework of the Prüm-Decisions are provisioned by:

- Art.25(2) of Council Decision 2008/615/JHA

and:

- Art.20(2) of Council Decision 2008/616/JHA
- Chapter 4 of the Annex to Council Decision 2008/616/JHA

III. PROGRAM OF THE EVALUATION VISIT

5. The VRD-evaluation team visited the competent authorities in Finland on 17, 18 and 19 March 2010. The detailed program is enclosed (cf. *Annex 1*).

IV. PARTICIPANTS IN THE EVALUATION VISIT

Finland		
Organisation	**Represented by**	**Role**
National Bureau of Investigations	Jussi HYYSALO	National contact point for both incoming and outgoing requests
National Police Board	Marja KARTILA Kari SANTALAHTI	Supervising implementation and data protection/data security issues
Haltik – Internal Security ICT Agency	Kari RAVANTTI	Host EUCARIS server, logging
TraFi – Transport Safety Agency	Minna LAAKSONEN	Vehicle registration authority

Additional information:

On behalf of Finland, these representatives presented – also by means of demonstrations – the EUCARIS/Prüm information flow, from both a functional and technical, as well as a data protection-perspective. Subsequently, they were interviewed by the members of the evaluation team.

Evaluation Team		
Member State/organization	**Participant**	**Specialist role**
Belgium	Pierre LEBRUN	Lead expert for the evaluation visit
Belgium	Koen NOTE	Functional requirements and data protection
France	Christophe DEFREMONT	Functional requirements and data protection
EUCARIS-NPO	Herman GROOTERS	EUCARIS/Prüm-project manager

Additional information:

The evaluation team consisted of a total of 4 persons. The visit covered all three fields: functional, technical and data protection-issues.

V. Data protection

V.1 Legislation

6. The Council of Europe Convention entered into force in Finland 1st April 1991. They have not ratified the Additional Protocol but Finnish national law is in compliance with the Protocol. The Personal Data Act (523/1999) entered into force on 1st June 1999 and the Act on the processing of data by the police (761/2003) entered into force 1st October 2003.

7. Some issues are dealt with in a draft proposal which will be submitted to Finnish parliament during the first half of 2010 and is expected to pass by fall this year. These provisions deal with the following articles in the Decisions and are informative by their nature:

    (a) article 26 (3) of Council Decision 2008/615/JHA, regarding the purpose for which supplied data is used.

    (b) article 28 (3) of Council Decision 2008/615/JHA, regarding deletion of data which should not have been supplied, deletion of lawfully supplied data in due time and blocking of data.

    (c) article 30 (4 & 5) of Council Decision 2008/615/JHA, regarding protection of log files and the role of the DPA.

V.2 Data Protection Authorities

8. The Office of the Data Protection Ombudsman is an independent authority operating in connection with the Ministry of Justice. The office is run by the Data Protection Ombudsman, appointed by the Council of State for a term of five years. The total number of staff is 20. The Data Protection Board consists of a chair, deputy chair and five members, who are required to be familiar with register operations. The Board is appointed by the Council of State for a term of three years. The objective of the Office of the Data Protection Ombudsman is to maintain and promote the right to privacy, one of the basic rights of each citizen, by fulfilling the duties assigned to the Data Protection Ombudsman by legislation:

(a) cooperating with data subjects and controllers and organizations representing them as well as other related bodies, aiming at preventing violation of privacy.

(b) in advance promoting the development of, and compliance with, good data processing practices

(c) assisting and supporting the development and use of systems supporting and safeguarding privacy.

The Office of the Data Protection Ombudsman makes binding decisions only in matters concerning the implementation of the right of verification and the correction of personal data. In terms of enforcement, it is mainly focused on delivering recommendations after conducting audits. If measures of guidance and advice have failed to remedy a given situation, the Data Protection Ombudsman may, in certain cases, bring an act of violation to the consideration of the Data Protection Board.

Pursuant to the framework of Council Decisions 615 and 616, the DPA is obligated to carry out periodical checks on the correct use of the application and provided data. Results of these checks are to be kept available by the DPA for a period of 18 months, after which they are to be deleted[4]. These provisions are part of the aforementioned draft proposal in Finnish parliament (cf. V.1 Legislation), but at the time of the evaluation visit, no practical procedures had been put in place guaranteeing these periodical checks.

9. Contact details:

OFFICE OF THE DATA PROTECTION OMBUDSMAN

PO Box 315, 00181 HELSINKI.

Albertinkatu 25, 3rd floor, HELSINKI.

Tel. 010 36 66700

Fax 010 36 66735

www.tietosuoja.fi

10. It is advisable for Member States to have a clear policy set out on how to act in contacts with other Member States' DPAs as article 30 (5) of Council Decision 2008/615/JHA states that: *'Each data protection authority may be requested by the independent data protection authority of another Member State to exercise its powers in accordance with national law.'* The Finnish DPA has several international contacts. The Data Protection Ombudsman is a member of the consultative, independent working group of national Data Protection Ombudsmen[5]. In addition to this, the Data Protection Ombudsman is a member of the joint supervisory bodies included in the Europol and Schengen agreements. Outside the EU framework, the Data Protection Ombudsman takes part in the annual meetings of the Nordic Data Protection Ombudsmen and the annual global Data Protection Conference. There are also regular meetings between the European Ombudsmen and the Finnish Ombudsman fully participates in these meetings.

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[4] Article 30 (5), Council Decision 2008/615/JHA on the stepping up of cross-border cooperation, particularly in combating terrorism and cross-border crime

[5] Directive 95/46/EC of the European Parliament and the Council of October 24th 1995 on the protection of individuals with regard to the protection of personal data and on the free movement of such data

V.3 Procedural Measures

11. Purpose limitation is taught to Finnish police officers during their basic training and, in addition to that, the entire personnel of the Finnish police have to pass an e-learning module on data protection and data security to obtain a certificate. These courses are not specifically aimed at databases within the Prüm-framework, but apply to all sources available in Finland. Finland has produced a manual for competent authorities on the use of databases containing personal data.

12. Article 19 of the Act on the processing data by the police provides in a detailed way when it is allowed to supply data to other authorities than the police. According to the Act, the police can supply data if it is requested for instance by border guard patrols for border surveillance, conducting border checks and monitoring persons' entry into and departure from the country. Article 27 of Council Decision 2008/615/JHA on competent authorities states that data can be passed on to other entities only with the prior authorization of the supplying Member State and in compliance with the law of the receiving Member State. The NBI produced and updates a handbook on cross-border mutual legal assistance, which deals with purpose limitation and restrictions on the use of data supplied by other countries. This handbook states that both limitations in Finnish law and in agreements between Finland and foreign countries shall apply to these matters. Finland argued that this should be dealt with on a case by case basis, but still guidelines should be put in place describing procedures. The obvious procedure would be for the NCP of the requesting state to contact the NCP of the supplying state to request authorization before passing on any data to other entities.

13. Supervisors within the Finnish police are obliged to carry out periodical checks on the use – and possible misuse – of personal data by their personnel[6]. The procedure states that they should randomly select a certain number of officers and request Haltik to produce an overview of all their logged activities in databases containing personal data. This overview is subsequently checked by the NPB (Technology Department – Register Administration) and forwarded to the requesting supervisor for a second check. In the past this procedure has already led to some court cases on the grounds of misuse of information. The Organisational Security department and the Control of Legality department of the NPB's Advisory Staff monitor data protection and data security within the Finnish police in general.

V.4 Technical and organizational measures

14. In case there is suspicion of data being incorrect, no data is sent at all by TraFi, while incomplete data could be more useful to the requesting party than no data at all. The TraFi database currently does not support the option to flag[7] data as being uncertain, although it is foreseen in article 27 of the Act on the Processing of Personal Data by the Police. TraFi told the evaluation team that they would look into this issue.

15. Deletion of data, within periods clearly defined in Council Decision 2008/615/JHA article 28, is regulated through Chapter 5 of the Act on the Processing of Personal Data by the Police and further elaborated in the aforementioned draft proposal currently submitted to Finnish parliament (cf. *V.1*). At the moment of the evaluation visit, no Finnish procedures or guidelines were available on the blocking of contested data pursuant to article 28 (3) of Council Decision 2008/615/JHA, although it is possible according to the article 22.5, 23.2 and 26.2 in the Act on the Processing of Personal Data by the Police.

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[6] Order SM-2006-01324/TU-42 of the Ministry of Interior

[7] Article 28, Council Decision 2008/615/JHA on the stepping up of cross-border cooperation, particularly in combating terrorism and cross-border crime

16. Logging of incoming and outgoing requests happens in line with the provisions in Council Decisions 2008/615 & 616/JHA (cf. infra, *VI.3 & VII.4*). During the evaluation visit it was noted that, although alterations made to the log files are logged themselves and log files are backed-up once a day to a centralised database, the log files are currently only protected against internal threats (deletion by own staff) by standard database authorization. Log files are kept in locked and physically protected areas, only accessible to authorized personnel, protecting them against external threats.

V.5 Data subjects' rights

17. The Ministerial order (22.9.2003 SM-2003-2621/Si-2) on data subject's rights to access includes detailed provisions for how to proceed in order to make use of the rights of the data subject in respect to the processing operation in the Finnish police organisation. According to this order every police unit in Finland has to ensure that data subjects can easily use their rights to access by keeping police register files available at information desks. This file shall include: updated data protection legislation and ministerial order, rules of procedure to use rights, description of files and forms of access.

18. The Data Protection Ombudsman can on the request of registered persons also check the legality of data concerning them in these files. Personal data can be checked once a year free of charge. A request for scrutiny must be presented personally to the District Police, from where the request is forwarded to the Data Protection Ombudsman or to other authorities if necessary. Persons making such a request must prove their identity. In cases there is no right of scrutiny, the Data Protection Ombudsman can verify that the data is legal.

19. Everyone has the right to know what data, with a few exceptions, concerning him/herself is stored in a personal data file or if no data has been entered in the file at all. In addition to restrictions specified in the Personal Data Act, the Police Personal Data File Act denies access to: the Suspect Data System, the Operation Data System of the Security Police, the national Schengen Information System in cases referred to in Article 109(2) of the Schengen Convention, classification, surveillance or modus operandi data concerning a person or act contained in police personal data files.

VI. EVALUATION NATIONAL CONTACT POINT FOR INCOMING REQUESTS

VI.1 Description

20. The contact details for the Finnish NCP for both incoming and outgoing requests:

National Bureau of Investigations

International affairs – Communication Centre

Jokiniemenkuja 4, Box 285

FI-01301 Vantaa

Phone : +35 8 71 878 6910

Fax: +35 8 71 878 6911

Email: SIRENE.KRP@poliisi.fi

21. Finland opted for one and the same NCP for incoming and outgoing requests in the Prüm/VRD-framework. It will also serve as NCP for the exchange of fingerprints and DNA in the framework of Council Decisions 2008/615 & 616/JHA. The Communication Centre at the NBI is contactable 24/7 and centralises all major Finnish international police cooperation as it also serves as Europol National Unit, SIRENE-office and National Central Bureau for Interpol. All questions, either practical or technical, are to be addressed to the NBI, who will then disperse them internally themselves.

VI.2 Information-flow architecture

22. It should be noted that the Finnish NCP at the NBI is no physical part of the EUCARIS information chain. All incoming messages are routed through Haltik, which holds the Finnish National EUCARIS server. Incoming VRD-requests are then automatically routed via the EUCARIS server to the EAI server (Enterprise Application Integration), which is used in or between various systems as an interface element. EAI, in the case of EUCARIS, executes inquiries to the Finnish national vehicle register (ATJ[8]), triggered by the EUCARIS inquiry message. EAI does some validation checks to the fields used on the inquiry (e.g. blocking too long licence codes). This is done for performance reasons, to prevent any worthless inquiries to be done on the local vehicle register as it is known it will return an error code or "vehicle not found" in those cases. EAI then assembles a return message based on inquiry criteria received, which is sent back to the requesting state through the EUCARIS server and the sTesta network.

Scheme 1

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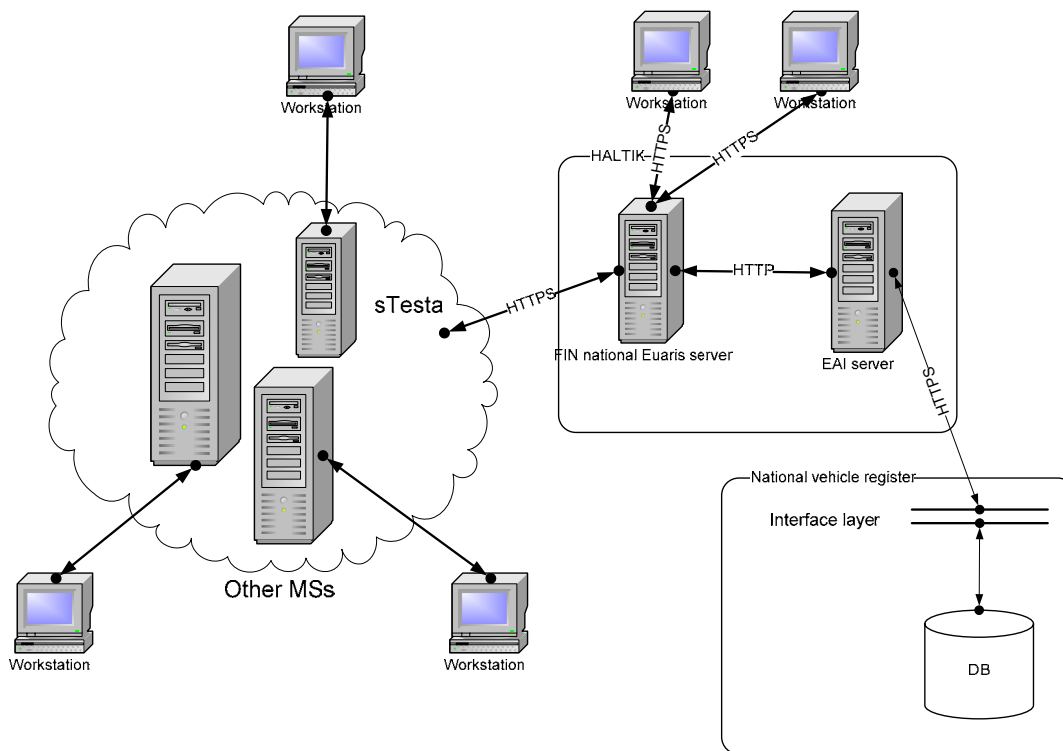
[8] ATJ = AjoneuvoTietoJärjestelmä. A direct translation would be "Vehicle Information System". Vehicle data is updated, for instance, during periodical inspection.

VI.3 Provided information

23. TraFi provides all mandatory data – by chassis number and by license plate – as listed in Council Decision 2008/616/JHA (chapter 3, 1.2.2.2)[9], as well as some optional data. The evaluation team observed some minor deviations from these functionalities:

(a): In case of disputed ownership, a vehicle status 'unverified data' is returned. This is a deviation from the specifications. It is recommended to adapt the application and to return a specific message instead, indicating the uncertainty of the data.

(b): Statuses are shown, except for status category 7 (duplicate documents issued). Certain Finnish signals weren't recognised by the EUCARIS application. National, non-harmonised vehicle statuses (signals) should be ignored and not be communicated to other Member States. It is recommended to adapt the application accordingly.

(c): Data related to insurance is only shown if the vehicle has been registered after November 2007.

(d): A search can result in multiple hits. If this is the case, Finland will not return any vehicle data, but instead return an error message. Situations were multiple vehicles can correspond to the same chassis number are rare, but do exist. It is recommended to adapt the application a.s.a.p. in order to support the return of multiple vehicle data.

(e): If the vehicle holder is the same as the vehicle owner, the TraFi only registers the vehicle owner, and subsequently only transmits vehicle owner. It is advised to clarify this in the supporting help-file.

24. Finland will make all kinds of license plates/vehicle types that are found in Finnish vehicle register available [10]. Not all military vehicles are registered in the Finnish vehicle register and Finland does not issue probe/constructor license plates. TraFi doesn't have data concerning the Åland vehicle register. Åland has its own vehicle register.

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[9]   For a full overview of provided data cf. annex A of the EUCARIS test summary report – Annex 2

[10]   A summary on vehicle types on which Finland holds VRD can be found in document 10792/2/09 CRIMORG 93 ENFOPOL 165

VI.4 System Performance

25. The performance of the information provision during the demo at the time of the evaluation visit was good. Correct matches were produced on known data. Reply times were well under the required 10 seconds. The EUARIS server at Haltik runs on a system linking three different servers and switching automatically between these servers in case a technical malfunction occurs, guaranteeing 24/7 availability of the system. Finland obtained the production certificate from the EUCARIS NPO. A full report of the acceptance test is attached to this report in annex 2.

VI.5 Logging of incoming requests

26. As soon as EUCARIS' work on the Log Viewer Tool is complete, Finland plans to use this tool to manage log files. At the time of the evaluation visit EUCARIS had already delivered a test-version of the tool, but Finland didn't test it yet.

27. Incoming requests are logged on two separate levels in the Finnish EUCARIS system, both in Haltik and are to be backed-up once a day to a centralised system:

(a): The integration system between the EUCARIS server and Finnish Vehicle register system (EAI) records – and retains for a period of two years – following data:

> The MessageHeader of incoming queries, which helps to identify the message.
>
> Registration number, VIN and reference date used in the query are recorded if exception (Vehicle Register returns an error or nothing at all) occurs during the vehicle query.
>
> No personal data of the holder/owner of the vehicle is recorded

(b): The EUCARIS server records – and retains for a period of two years – following data:

> All queries and reply messages containing the message header, personal information of the vehicle owner and holder, vehicle information and insurance data.

VII. EVALUATION NATIONAL CONTACT POINT FOR OUTGOING REQUESTS

VII.1 Description

30. Finland opted for a single NCP for both incoming and outgoing requests. (Cf. supra: *VI.1*)

VII.2 Information-flow architecture

31. A number of police officers have been authorized to have access to the Prüm/VRD-functionalities in Finland and send outward requests (cf. infra: *VIII. User community*). These will use the standard EUCARIS WebClient in a decentralized way. Personal workstations will be connected through a secure line (https) to the Finnish National EUCARIS server. From there on, requests are sent through the sTesta network to other connected Member States.

Scheme : cf. VI.2, scheme 1

VII.3 Logging of outgoing requests

32. The EUCARIS server logs the entire request made by Finnish competent authorities (with reference and identification of the requesting party) into a dedicated database. Awaiting the Log Viewer currently under construction by EUCARIS, log searches can be made with simple SQL query. Any string can be used as search criteria on that query in order to find the sought-after log writing. Log files are backed-up once a day to a central system. It was observed that a 'service-file-number', relating a request to a specific case, is logged in a correct way, which enables the DPA or other auditors to evaluate the reason and legitimacy of the request.

VIII. USER COMMUNITY

VIII.1 Description

33. Finland has only one police organisation, which is based on the Police Act. According to this act the duty of the police is to secure judicial and social order, maintain public order and security, prevent and investigate crimes and forward cases to prosecutor for consideration of charges. The scope of the 2008/615/JHA & 616 Decisions is quite wide, so Finland considers this tool necessary for all Finnish police officers. Access to the EUCARIS/Prüm system will therefore be granted in a centralised way to +/- 8000 police officers. Customs and border guard officers will have to consult the EUCARIS/Prüm system in an indirect way, by contacting the police.

VIII.2 Access authorization

34. At present, the Finnish authorities do not differentiate as regards access to Finnish VRD and VRD in the framework of the Prüm-Decisions and currently, there are no plans to revise this policy. As from a legal point of view, this in itself does not constitute a hindrance. Moreover: for operational reasons, it appears logic that personnel having access to Finnish VRD may also encounter vehicles from other Member States requiring identification. This all together means that in relation to the *'specially authorised officers'* as described in art. 30(2)(a) 2008/615/JHA all competent personnel at the Finnish user organisations (cf. *supra*: *VIII.1 Description*) are considered specially authorised.

35. For all police ICT-systems Finland uses their 'Active Directory'-system, granting officers access rights to necessary databases and systems through a web-based platform application. This system consists of a unique user identification ('p-code') and a password. This username and password are supplied by Haltik. The Active Directory credentials are compatible with EUCARIS and will also be used for this application. Once available, Finland will use the EUCARIS User Management Tool.

IX. APPLICABILITY ART. 12 COUNCIL DECISION 2008/615/JHA

36. Finland applies as a general rule that no information is requested from abroad concerning minor offences. This is in line with article 12 of Council Decision 2008/615/JHA (criminal offences). Judgement whether there is sufficient reason to check EUCARIS/Prüm (purpose) is left to the officers on a case by case basis. Since there is no clear policy in place on reasons for which the EUCARIS/Prüm-application can be used in Finland, the evaluation team did not get a clear documented overview. It is recommended that such business rules are drafted and communicated to all competent personnel.

37. Even though it is up to Member States to determine the use policy for the EUCARIS/Prüm-application, it remains unclear if the current policy choice in Finland is fully in line with the wording in art. 12 2008/615/JHA.

X.   CONCLUSION

38. The implementation of the EUCARIS/Prüm-application and the related Prüm/VRD-information flow, both on a legislative level as on a technical level, has been done up to an important level in the Finland. However, the evaluation team would like to draw the attention to four points that need further clarification:

(a) As a general remark, apart from the transposition into national law, several provisions of the 2008/615/JHA and 2008/616/JHA require specific guidelines and procedures describing to officers in the field how to act in certain cases. The evaluation team took note of the fact that in some cases (flagging, blocking and deletion of data; providing data to 3rd parties) these procedures and guidelines weren't available yet at the time of the evaluation visit.

(b) Nearly all provisions in the 2008/615/JHA and 2008/616/JHA Council Decisions have been transposed into national law. There are, however, some provisions which are part of a draft proposal currently in Finnish parliament. Until this proposal is adopted, Finland does not fully comply with legal requirements of these decisions.

(c) Some minor functional issues were noted that need adaptation:
- In case of disputed ownership, a specific message should be returned indicating the uncertainty of the data, in stead of a vehicle status 'unverified data'.
- National, non-harmonised vehicle statuses (signals) should be ignored and not be communicated to other Member States. Work on this issue is currently ongoing in Finland.
- In case a search results in multiple hits, multiple vehicle data should be returned, instead of an error message. Finland argues that this occurs very rarely and should be resolved by contacting the NCP. Eucaris advises however to resolve this on application level.

(d) Since it was observed that log files are at present protected against internal threats (possibility of deletion of log files by own personnel) only via standard database authorization methods, Finland is invited to report further on counter measures in this field.

39. Based on the evaluation team's observations, the Sub Group on VRD proposes the Ad Hoc Group on Information Exchange to invite the Finnish delegation to give additional feed-back on the four observations put forward in this conclusion. Other than these, no items were identified that may cause reason to postpone the further roll-out of the system in the Finland.

XI.   ANNEXES

1.   Evaluation visit program

2.   Test summary report – VRD Acceptance test Finland for Prüm

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Schedule evaluation visit Finland 17-19 March 2010

17 March (wed)

Arrivals in Helsinki-Vantaa
12.20 - 13.35   Connection flight to Rovaniemi

Meeting venue
15.00 - 15.30   Briefing evaluators: concepts – schedule – forms – methodology

15.30 - ca. 19.00 <u>SESSION 1: General presentation</u>
- o   National Law
- o   National organisation
- o   General processes
- o   Check form Data Protection (6661/1/09 REV 1 ADD 1)

<u>SESSION 2: Incoming requests</u>
- o   Presentation architecture: logging – security – network – web client
- o   Check elements transmitted (cfr list chapter 3, 1.2.2.1), statistics
- o   Business rules, manuals
- o   Check list add 4 (6661/1/09 REV 1 ADD 4)
- o   Check list add 5 (6661/1/09 REV 1 ADD 5)
- o   Demo incoming request NL-FI

Dinner

18 March (Thu)

Check-out

09.00 - 12.00   <u>SESSION 3: Outgoing requests</u>
- o   Presentation architecture: logging – security – user policy/authorisation – authorised officers – network – data protection – Web client (lay-out, reason for consultation)
- o   Business rules, manuals
- o   Check list add 4 (6661/1/09 REV 1 ADD 4) Check list add 5 (6661/1/09 REV 1 ADD 5)
- o   Demo outgoing request FI-NL
- o   Statistics
- o   Discussion with users + visit on site

12 - 13 .30   Lunch

13.30 - 15.30   Visit to HALTIK server rooms / Transportation to airport

18.05 - 19.20   Flight Rovaniemi - Helsinki

Accommodation

19 March (Fri)

Check out, walking to NBI

8.30 - 12.00   SESSION 4: Visit in NCP / Drafting

12.00   Departures

Test summary report

Acceptance test Finland for Prüm

This document describes the activities and results of the acceptance test performed for connecting Finland to the Prüm system

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Document references

No.	Title	Author	Version / status / date
[DOC-1]	XML Message Specification Vehicle/Owner/Holder Information Prüm	Idske Dijkstra Sjaak Kempe	5.0/final/01-04-2009

Contents

2. Introduction

1.1. General

This document describes the test activities and results of the acceptance test performed by the RDW and Finland. The results of this acceptance test will be one of the criteria upon which the decision will be based to accept Finland to connect to the Prüm system.

During this acceptance test the following checks have been made.

- Check whether the request messages generated by Finland are correct (§2.1)
- Check whether the Finnish Prüm response messages comply to the xml message specification and are filled with a sufficient amount of useful date (§2.2)
- Check whether the Message of the Day functionality functions correctly between the acceptance environments of Finland and the Netherlands. (§2.3)
- Check whether the elements in the XML header are filled correctly for logging purposes (§2.4)

1.2. Main characteristics of the Finnish vehicle register

In the Finnish vehicle registration license plates are related to the vehicle and not related to the owner or region where the vehicle is registered. This means that the registration number of a license plate will not change when the owner of a vehicle changes or when the owner moves to another part in Finland.

A Finnish registration number on a Finnish license plate is unique within a vehicle category. This means that a number is not unique when all Finnish vehicle categories are taken in account. As a result of this, an inquiry on registration number may result in multiple hits. If this is the case, Finland will return a limited dataset with the possibility to make a more detailed search by including a chassis number in the inquiry, making it possible to extract the complete dataset from the inquired Finnish vehicle.

Historical data is kept in the Finnish register, making it possible to use reference dates to search for information on previous owners and signals (in some cases also holder information is available). If no reference date is used in a Prüm inquiry the most recent registration will be returned.

Vehicle data returned is partially historical. The vehicle data returned will not change dependent upon the reference date used. However, whether a vehicle will be found or not is dependent of the reference data time. If a reference data is used that lies before the first registration date of a vehicle this will result in a not-found message with an indication that a reference date is used that lies before the first registration date. If a registration date is used that lies on or after the first registration date, of if no reference date is used at all, the vehicle information as currently registered will be returned. If a vehicle registration has ended, the vehicle will still be returned with a filled 'end registration date'.

Signal data returned are also partially historical. When an inquiry is done with a reference date, only the signals active on the given date are returned. However especially older data can contain incomplete data registrations (data stored before the start of the current vehicle register system). Therefore, signal codes containing no start and end dates are always returned despite of the use of a reference data. If no reference date is used, all registered signals will be returned (also ended signals). All signals will be returned, including the *stolen* signal, with the exception of the signal *duplicate documents issued*. If a signal is registered that cannot be translated to a Prüm signal, this will be translated to *Not specified*.

Information concerning the owner of a vehicle is always present in a vehicle. In some cases information concerning a holder is also available. Owner/holder information is historical. If no reference date is used the most recent known owner (and, in some cases, holder) will be returned. In some cases the start or end dates of the former or current owner/holder are not present in the Finnish Vehicle register. In this case the owner or holder will not be included in the response message and a message, warning about "Unverified data", will be included indicating that the data can not be verified.

In the Finnish register vehicles are registered that cannot be classified into a European vehicle category used in Eucaris. For example, Finland also returns information about snowmobiles which do not fit into an EU vehicle category code used in Prüm. In these cases the code XXX (not specified) will be returned as the vehicle category code.

Finland also registers some information about the vehicle insurance. If no insurance information for a vehicle can be found one may conclude the vehicle is not insured.

2. Test activities and results

2.1. Request Message

Finland can request Prüm information using the three following request messages:

- VehOwnerHolderByRegNumAndDate
- VehOwnerHolderByChassisAndDate
- VehInsByRegNumAndDate

For all three types of messages it is checked whether their structure is in compliance with the XML message specification 'Vehicle/Owner/Holder Information Prüm' [DOC-1]. The same is done for the values that are used to fill the various elements in the request message. Special attention has been given to the header element *ServiceFileNumber.* Although, according to the XML message specification, this element is optional, due to international agreements this element should be filled. During the acceptance test this element was filled by Finland with 'test'. During the evaluation visit, Finland should specify how the serviceFileNumber will be filled by the Finnish Prüm users/systems in the production environment and how the value in this element will support identifying the reason for making the request.

Below the request messages which are generated by Finland can be found. No deviations from the specifications were found.

VehOwnerHolderByRegNumAndDate

```xml
<VehOwnerHolderByRegNumAndDate xmlns="">
 <Header>
   <MessageID>c28d3134-e9d3-4382-aa20-44a86615be59</MessageID>
   <MessageVersion>1.0</MessageVersion>
   <ServiceExecutionReason>
    <ServiceExecutionReasonCode>0</ServiceExecutionReasonCode>
    <ServiceExecutionReasonDesc>Not Specified</ServiceExecutionReasonDesc>
   </ServiceExecutionReason>
   <ServiceFileNumber>test</ServiceFileNumber>
   <RecipientCountry>NL2</RecipientCountry>
   <SenderCountry>FIN</SenderCountry>
   <SenderOrganisation>
    <SenderOrganisationCode>0</SenderOrganisationCode>
    <SenderOrganisationDesc>NOT SPECIFIED</SenderOrganisationDesc>
   </SenderOrganisation>
   <SenderName>Prüm-ajon-testi\administrator</SenderName>
   <TimeStamp>2009-12-01T10:31:58.390625+02:00</TimeStamp>
   <TimeOut>0</TimeOut>
 </Header>
 <Body>
   <Request>
    <VehCountryReq>NL2</VehCountryReq>
    <VehRegistrationNumberReq>
     <VehRegistrationNumberPart1Req>01gsrs</VehRegistrationNumberPart1Req>
    </VehRegistrationNumberReq>
   </Request>
 </Body>
</VehOwnerHolderByRegNumAndDate>
```

VehOwnerHolderByChassisAndDate

```xml
<VehOwnerHolderByChassisAndDate xmlns="">
 <Header>
  <MessageID>01023e0c-eb3c-4173-8241-337debaefd49</MessageID>
  <MessageVersion>1.0</MessageVersion>
  <ServiceExecutionReason>
   <ServiceExecutionReasonCode>0</ServiceExecutionReasonCode>
   <ServiceExecutionReasonDesc>Not Specified</ServiceExecutionReasonDesc>
  </ServiceExecutionReason>
  <ServiceFileNumber>emergency1f</ServiceFileNumber>
  <RecipientCountry>NL2</RecipientCountry>
  <SenderCountry>FIN</SenderCountry>
  <SenderOrganisation>
   <SenderOrganisationCode>0</SenderOrganisationCode>
   <SenderOrganisationDesc>NOT SPECIFIED</SenderOrganisationDesc>
  </SenderOrganisation>
  <SenderName>Prüm-ajon-testi\administrator</SenderName>
  <TimeStamp>2009-12-10T09:43:48.350375+02:00</TimeStamp>
  <TimeOut>0</TimeOut>
 </Header>
 <Body>
  <Request>
   <VehCountryReq>NL2</VehCountryReq>
   <VehIdentificationNumberReq>SFACXXBDVCGT27955</VehIdentificationNumberReq>
  </Request>
 </Body>
</VehOwnerHolderByChassisAndDate>
```

VehInsByRegNumAndDate

```xml
<VehInsByRegNumAndDate xmlns="">
 <Header>
  <MessageID>f4f6fda5-2a0c-4315-a6a2-c2f7a4e885da</MessageID>
  <MessageVersion>1.0</MessageVersion>
  <ServiceExecutionReason>
   <ServiceExecutionReasonCode>0</ServiceExecutionReasonCode>
   <ServiceExecutionReasonDesc>Not Specified</ServiceExecutionReasonDesc>
  </ServiceExecutionReason>
  <ServiceFileNumber>test</ServiceFileNumber>
  <RecipientCountry>NL2</RecipientCountry>
  <SenderCountry>FIN</SenderCountry>
  <SenderOrganisation>
   <SenderOrganisationCode>0</SenderOrganisationCode>
   <SenderOrganisationDesc>NOT SPECIFIED</SenderOrganisationDesc>
  </SenderOrganisation>
  <SenderName>Prüm-ajon-testi\administrator</SenderName>
  <TimeStamp>2009-11-24T11:10:32.75+02:00</TimeStamp>
  <TimeOut>0</TimeOut>
 </Header>
 <Body>
  <Request>
   <VehCountryReq>NL2</VehCountryReq>
   <VehIdentificationNumberReq>25P0S1TNEUCAR1STEST01GSRS</VehIdentificationNumberReq>
```

```
  <VehRegistrationNumberReq>
   <VehRegistrationNumberPart1Req>01GSRS</VehRegistrationNumberPart1Req>
  </VehRegistrationNumberReq>
 </Request>
 </Body>
</VehInsByRegNumAndDate>
```

No errors were found in the three message types. Finland used the default Eucaris Webclient for generating these messages during the acceptance test. If a customized webclient will be used in the future, the RDW should be contacted to perform an acceptance test by checking the request messages generated by the customized webclient before connecting to the Prüm production environment.

2.2. Response messages

Finland supports all three types of Prüm inquiries (vehicle owner/holder inquiry on registration number, vehicle owner/holder inquiry on chassis number and inquiry on insurance information). Finland responds on these inquiries with the following response messages:

- VHOwnerHolderResponse
- VehInsuranceResponse

Finland supplied a testdataset to the RDW with which it was possible to request multiple Finnish vehicles. With the data supplied it was possible to request a variety of scenarios. Below the scenarios uses are described:

- Search for vehicle owner/holder data results in a not-found message
- Search for vehicle owner/holder data on registration number results in one found vehicle with a complete dataset
- Search for vehicle owner/holder data on chassis number results in one found vehicle with a complete dataset
- Search for vehicle owner/holder data on registration number results in multiple found vehicles with a limited dataset. It is possible to request the complete dataset by expanding the search with a chassis number
- Requesting historical vehicle owner holder data using a reference data/-time
- Requesting insurance information

The response messages generated by Finland were checked automatically to verify whether these are in compliance to the xml message specification [DOC-1]. Furthermore, using the Finnish Prüm dataoverview [Annex A] and the Acceptance Plan Eucaris II Prüm Finland [DOC-3] it was verified that data supplied the response messages where filled correctly. The scenarios could be executed correctly, no deviations from the expected results were seen during the last acceptance test session.

Below an example of a Finnish VehOwnerHolderResponse and a VehInsurance response can be found:

VehOwnerHolderResponse

```
<VehOwnerHolderResponse xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns="">
 <Header>
  <MessageID>c268f210-6df0-4f17-a3de-7029d1bbedee</MessageID>
  <MessageRefID>03bd1a74-5999-4bf2-b583-667801c8c9c7</MessageRefID>
  <MessageVersion>1.0</MessageVersion>
  <ServiceExecutionReason>
   <ServiceExecutionReasonCode>0</ServiceExecutionReasonCode>
   <ServiceExecutionReasonDesc>Not Specified</ServiceExecutionReasonDesc>
```

```xml
      </ServiceExecutionReason>
      <ServiceFileNumber>Int acc test FIN</ServiceFileNumber>
      <RecipientCountry>NL2</RecipientCountry>
      <SenderCountry>FIN</SenderCountry>
      <SenderOrganisation>
        <SenderOrganisationCode>0</SenderOrganisationCode>
        <SenderOrganisationDesc>NOT SPECIFIED</SenderOrganisationDesc>
      </SenderOrganisation>
      <SenderName>ARDW\juurlink</SenderName>
      <TimeStamp>2010-01-20T17:07:31.760+02:00</TimeStamp>
      <TimeOut>0</TimeOut>
    </Header>
    <Body>
      <VehicleCountries>
        <VehicleCountry>
          <VehCountry>FIN</VehCountry>
          <VehCountryReplies>
            <VehCountryReply>
              <VehBodyReply>
                <Vehicle>
                  <VehIdentificationNumber>WF0NXXGCANJG55606</VehIdentificationNumber>
                  <VehRegistrationNumber>
                    <VehRegistrationNumberPart1>BJO-444</VehRegistrationNumberPart1>
                  </VehRegistrationNumber>
                  <VehReferenceDateTime>2010-01-20T17:07:31.758+02:00</VehReferenceDateTime>
                  <VehRegDocIdentifications>
                    <VehRegDocIdentification>
                      <VehDocumentID>18</VehDocumentID>
                    </VehRegDocIdentification>
                    <VehRegDocIdentification>
                      <VehDocumentID>16</VehDocumentID>
                    </VehRegDocIdentification>
                  </VehRegDocIdentifications>
                  <VehMake>Ford</VehMake>
                  <VehCommercialName>ESCORT</VehCommercialName>
                  <VehEuropeanUnionCategoryCode>M1</VehEuropeanUnionCategoryCode>
                  <VehFirstRegistrationDate>19889999</VehFirstRegistrationDate>
                  <VehStartRegistrationDate>19880602</VehStartRegistrationDate>
                  <VehCapacity>1290</VehCapacity>
                  <VehSignals>
                    <VehSignal>
                      <VehSignalCode>0</VehSignalCode>
                      <VehSignalDesc>NOT SPECIFIED</VehSignalDesc>
                      <VehSignalRegistrationDate>20091023</VehSignalRegistrationDate>
                    </VehSignal>
                  </VehSignals>
                </Vehicle>
                <VehOwner>
                  <VehOwnerLegalEntity>
                    <VehOwnerLegalEntityCode>NP</VehOwnerLegalEntityCode>
                    <VehOwnerLegalEntityDesc>Natural person</VehOwnerLegalEntityDesc>
                  </VehOwnerLegalEntity>
                  <VehOwnerReferenceDateTime>2010-01-20T15:07:31.758Z</VehOwnerReferenceDateTime>
                  <VehOwnerPersonalInformation>
                    <VehOwnerSurname>Pokki</VehOwnerSurname>
```

```xml
          <VehOwnerOtherNames>
            <VehOwnerFirstName>Anna Karoliina</VehOwnerFirstName>
          </VehOwnerOtherNames>
          <VehOwnerInitials>AKP</VehOwnerInitials>
          <VehOwnerDateOfBirth>19910709</VehOwnerDateOfBirth>
          <VehOwnerGender>F</VehOwnerGender>
        </VehOwnerPersonalInformation>
        <VehOwnerAddress>
          <VehOwnerAddrStreetName>Koppelontie 18</VehOwnerAddrStreetName>
          <VehOwnerAddrPostcode>18300</VehOwnerAddrPostcode>
          <VehOwnerAddrPlaceOfResidence>HEINOLA KK</VehOwnerAddrPlaceOfResidence>
        </VehOwnerAddress>
        <VehOwnerStartDate>20090811</VehOwnerStartDate>
        <VehOwnerPrintableName>
          <VehOwnerNameLines>
            <VehOwnerNameLine>Anna Karoliina Pokki</VehOwnerNameLine>
          </VehOwnerNameLines>
        </VehOwnerPrintableName>
        <VehOwnerPrintableAddress>
          <VehOwnerAddressLines>
            <VehOwnerAddressLine>Koppelontie 18</VehOwnerAddressLine>
          </VehOwnerAddressLines>
          <VehOwnerAddressLines>
            <VehOwnerAddressLine>18300 HEINOLA KK</VehOwnerAddressLine>
          </VehOwnerAddressLines>
        </VehOwnerPrintableAddress>
      </VehOwner>
     </VehBodyReply>
    </VehCountryReply>
   </VehCountryReplies>
  </VehicleCountry>
 </VehicleCountries>
 </Body>
</VehOwnerHolderResponse>
```

VehInsuranceResponse

```xml
<VehInsuranceResponse xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns="">
 <Header>
  <MessageID>b3e5d8bd-a15f-4276-a045-cb9e8c86d805</MessageID>
  <MessageRefID>d8e7aba7-4c08-49fa-ba04-76d43200f350</MessageRefID>
  <MessageVersion>1.0</MessageVersion>
  <ServiceExecutionReason>
   <ServiceExecutionReasonCode>0</ServiceExecutionReasonCode>
   <ServiceExecutionReasonDesc>Not Specified</ServiceExecutionReasonDesc>
  </ServiceExecutionReason>
  <ServiceFileNumber>Int acc test FIN</ServiceFileNumber>
  <RecipientCountry>NL2</RecipientCountry>
  <SenderCountry>FIN</SenderCountry>
  <SenderOrganisation>
   <SenderOrganisationCode>0</SenderOrganisationCode>
   <SenderOrganisationDesc>NOT SPECIFIED</SenderOrganisationDesc>
  </SenderOrganisation>
  <SenderName>ARDW\juurlink</SenderName>
```

```
    <TimeStamp>2010-01-20T17:15:36.57+02:00</TimeStamp>
    <TimeOut>0</TimeOut>
  </Header>
  <Body>
   <VehCountry>FIN</VehCountry>
    <VehBodyReplies>
     <VehBodyReply>
      <VehRegistrationNumber>
       <VehRegistrationNumberPart1>BJO-444</VehRegistrationNumberPart1>
      </VehRegistrationNumber>
      <VehIdentificationNumber>WF0NXXGCANJG55606</VehIdentificationNumber>
      <VehInsurance>
      <VehInsReferenceDateTime>2004-08-28T11:11:00+02:00</VehInsReferenceDateTime>
      <VehInsCompanyName>L?hivakuutus</VehInsCompanyName>
      <VehInsPrintableName>
       <VehInsNameLines>
        <VehInsNameLine>L?hivakuutus</VehInsNameLine>
       </VehInsNameLines>
      </VehInsPrintableName>
      <VehInsStartDate>20040819</VehInsStartDate>
      <VehInsEndDate>20090811</VehInsEndDate>
     </VehInsurance>
    </VehBodyReply>
   </VehBodyReplies>
  </Body>
</VehInsuranceResponse>
```

2.3. Message of the Day

Planned maintenance, system problems or other relevant operational messages can be communicated to other member states using the message of the day functionality within the Eucaris application. Using this functionality an administrator can enter the text to be communicated, select the countries to where this message should be send to and enter the timeframe when this text should be shown.

During the acceptance test, messages of the day sent by the RDW to Finland were received by Finland correctly, also Messages of the day sent by Finland to the RDW where received correctly by the RDW.

2.4. Logging

It should be possible to establish who requested certain Prüm information to an individual level. It should be possible to do so using some elements of the Finnish request messages logged by a Prüm member state.

The following request was logged by the RDW (Eucaris logging):
```
<VehOwnerHolderByRegNumAndDate xmlns="">
 <Header>
  <MessageID>c28d3134-e9d3-4382-aa20-44a86615be59</MessageID>
  <MessageVersion>1.0</MessageVersion>
  <ServiceExecutionReason>
   <ServiceExecutionReasonCode>0</ServiceExecutionReasonCode>
   <ServiceExecutionReasonDesc>Not Specified</ServiceExecutionReasonDesc>
  </ServiceExecutionReason>
  <ServiceFileNumber>test</ServiceFileNumber>
  <RecipientCountry>NL2</RecipientCountry>
```

```
    <SenderCountry>FIN</SenderCountry>
    <SenderOrganisation>
     <SenderOrganisationCode>0</SenderOrganisationCode>
     <SenderOrganisationDesc>NOT SPECIFIED</SenderOrganisationDesc>
    </SenderOrganisation>
    <SenderName>Prüm-ajon-testi\administrator</SenderName>
    <TimeStamp>2009-12-01T10:31:58.390625+02:00</TimeStamp>
    <TimeOut>0</TimeOut>
   </Header>
   <Body>
    <Request>
     <VehCountryReq>NL2</VehCountryReq>
     <VehRegistrationNumberReq>
      <VehRegistrationNumberPart1Req>01gsrs</VehRegistrationNumberPart1Req>
     </VehRegistrationNumberReq>
    </Request>
   </Body>
</VehOwnerHolderByRegNumAndDate>
```

It should be possible to identify the reason and origin of this request by using the following data
- Type of inquiry (Owner Holder Request by Registration Number)
- Date/Time of request (01-12-2009, 10:31:58 UTC+2)
- Vehicle requested (01GSRS)
- Person/system making the request (Prüm-ajon-test\administrator)
- ServiceFileNumber (test)

During the evaluation visit, Finland should specify how the reason and origin of the Prüm request can be identified using this data.

3.   Characteristics of the Finnish Prüm implementation

Below some of the most important characteristics of the Finnish vehicle owner-holder register are summarized.

- The search items license number and chassis number are not case sensitive.
- The license number can be entered with or without spaces and dashes (spaces and dashes will be filtered by Finland).
- A search on chassis number can result in multiple hits. If this is the case Finland will not return any vehicle data but will return an error message instead. Situations where multiple vehicles can be found with the same chassis number is rare.
- A search on license number can also result in multiple hits. If this is the case, a response with a limited dataset and a message 'MORE DATA AVAILABLE THAN PROVIDED' is returned. To request a complete dataset one can make a follow up inquiry using the license number and one of the chassis numbers that was returned in the limited dataset.
- Independent of the reference date/-time used in the request, the vehicle data returned (e.g. vehicle make, commercial name, capacity) concerns the data currently registered in the Finnish register, for this type of data no historical data is available. As vehicle reference data/-time the system date/-time will be returned. However if a reference date is used that lies before the first registration date of a vehicle this will result in a not-found message indicating that a reference date was uses that lies before the first registration date.
- The signal data returned is dependent upon the reference data in the request. If no reference data is returned, all signals registered for the vehicle will be returned. However, when a reference data time is used, signals for which it can be determined that the signal is *not* actual on the reference date will *not* be included in the response message (in other words, signals actual on the reference date used as well as signal without a known start-/end date will be returned when using a reference date).
- All types of signals will be returned with exception of the signal 7 (duplicate documents issued). If a Finnish signal cannot be translated to a Eucaris signal, Finland will use signal 0 (not specified).
- The owner/-holder data returned is dependent upon the reference date in the request, the reference time in the request will be ignored. The reason for this is that Finland does register start- and end date of a registration, but does not register the time.
- For Finnish vehicles an owner is always present in the register. In some cases also a holder will be registered and returned.
- When the registration start date and/or end date of an owner or holder is unknown, it cannot be established with absolute certainty who is the holder or owner of a vehicle at a specific reference date. If this is the case, Finland will not return the holder or owner with unknown registration dates, but will instead include an UNVERIFIED DATA message in their response with an indication whether this concerns the owner or the holder.
- Owners and holders can be a 'natural person' or a 'Legal entity other than natural person'
- Insurance data (however limited) is dependent on the reference date used in the request and will always be returned if a vehicle has insurance. When no insurance data is returned, one can conclude the vehicle requested has no insurance.
- During the acceptance test it was observed that Finland sends a response within a few seconds after making a Prüm request. Please note that it is not possible to make definite conclusions about the performance on the Finnish production environment based upon this observation on the acceptance environment.

4. Conclusion

The Prüm request and response messages generated by Finland are in accordance with the Prüm XML Message Specification [DOC-1]. No errors or deviations from these specifications were found. It was observed that most of the elements that are available in the Prüm response message structure are filled by Finland according to the Finnish Prüm data overview. It can therefore be concluded that there are no objections to authorize Finland to perform Prüm inquiries and to provide owner holder information to other Prüm member states.

5. Annex A – Prüm data overview

Data element	Type of data	Remarks
Data Overview FIN		
VehOwnerHolderByRegNumAndDate		
VehRegistrationNumberPart1	A	In Finland the registration number does not uniquely identify the vehicle. In case of multiple vehicles are found a limited info of each is returned. The registration numbers are always shorter than 10 characters in Finland.
VehRegistrationNumberPart2	-	
VehRegistrationNumberPart3	-	
VehRegistrationNumberPart4	-	
VehIdentificationNumberReq	A	The VIN is an optional search criteria in the registration number searches. The VIN is always shorter than 31 characters in Finland.
ReferenceDateTimeReq	A	Only the date affect on the query. The time does not affect to the query. 00 00 should be used in time fields.
VehOwnerHolderByChassisAndDate		
VehIdentificationNumberReq	A	Maximum allowed length of VIN is 30 characters.
ReferenceDateTimeReq	A	Only the date affect on the query. The time does not affect to the query.
VehOwnerHolderResponse		
Vehicle		
VehIdentificationNumber	I	If inquiry is done with VIN and more than one vehicle can be found, an error message is returned. Situation where multiple vehicles can be found with same VIN is rare. Because the registration number is not unique in Finland, the insurance queries are actually made using the VIN.
VehRegistrationNumberPart1	H	VehRegistrationNumberPart1 contains the full licence number as it is present in the Finnish Vehicle Register. The value is is the last known license number of the vehicle. Multiple vehicles can be found. If the registration of the vehicle has been suspended, the last known registration number is present and the suspension date is present in the VehEndRegistrationDate. If the registration number has changed and the ReferenceDateTimeReq applies to former license plates, the current registration number is still always present with the signal "REGISTRATION NUMBER CHANGED". The former registration numbers are never present. Temporary licenses which are not valid anymore can not be found. Temporary licenses which are currently valid are found with or without the ReferenceDateTimeReq.
VehRegistrationNumberPart2	-	
VehRegistrationNumberPart3	-	
VehRegistrationNumberPart4	-	
VehReferenceDateTime	H	VehReferenceDateTime contains both the date and time although the returned data is relevant for the whole date. If there is no reference date/time in query and there is no current vehicle found, the data of the last known vehicle matching the search criteria will be returned.
VehRegNumberTypeCode	-	

VehRegNumberTypeDesc	-	
VehDocumentID	I	The sequence number of the parts 1 and 2 of the registration certificate. Therefore, two distinct numbers are always returned. The values are unique for the individual vehicle. Starts from sequence number one on every vehicle.
VehMake	I	
VehCommercialName	I	
VehEuropeanUnionCategoryCode	I	Since codes used in Eucaris are quite limited a translation between national register and Eucaris is done. XXX is shown on Eucaris whenever no suitable code is found. Vehicle category L5e cannot be found from finnish vehicle register. This is caused by system fault found on local vehicle register. L5e is later returned as it becomes availabe without any further notice.
VehFirstRegistrationDate	I	Missing day or moth fields are filled with 99.
VehStartRegistrationDate	H	Missing day or moth fields are filled with 99. Inquiry done with a date returns the lates registration date. The VehStartRegistrationDate of the signal REGISTRATION NUMBER CHANGED is only present inquirys done with the ReferenceDateTimeReq.
VehEndRegistrationDate	I	Only present when the registration of the vehicle has ended, suspended or vehicle is exported to another country.
VehCapacity	I	cm3
VehMaxPower	I	KW
VehSignals		If no start or end date is present in signal it is always displayed.
VehSignalCode	H	Value '7' is never present. Inquiry done with date returns only the signals active on given date. However especially older (data stored before current vehicle register system) info can contain incomplete data. Therefore, signal codes containign no dates are always returned dispite of inquiry type. With historical inquiry any signal applicable and signals without start and end dates are returned. With non historical inquiry all of the signals are returned. Not all signals on vehicle register contains any dates. Note according to code 6. With non historical inquiry no dates are returned with this code. With historical inquiry StartDate is returned as a start date for the new licence number.
VehSignalDesc	H	Value 'DUPLICATE DOCUMENTS ISSUED' is never present. See VehSignalCode.
VehSignalRegistrationDate	H	The dates of the signal are not always present.
VehSignalEndDate	H	The dates of the signal are not always present.
VehHolder		Holder is present when found in the Finnish Vehicle Register. When the start or end dates of the former holdership are not present in the Finnish Vehicle register the message warning about "Unverified data" is present is present indicating that the data can not not be verified.
VehHolderLegalEntityCode	H	NP' or 'O'
VehHolderLegalEntityDesc	H	Natural person' or 'Legal entity other than natural person' are used.
VehHolderSurname	H	Present when VehOwnerLegalEntityCode='NP'
VehHolderFirstName	H	Present when VehOwnerLegalEntityCode='NP'. All the first names of the person are returned.
VehHolderMiddleName	-	
VehHolderOtherName	-	

VehHolderInitials	H	Present when VehHolderLegalEntityCode='NP'. The initals are returned from every name present in the VehHolderFirstName and the VehHolderFirstName.
VehHolderDateOfBirth	H	Present when VehHolderLegalEntityCode='NP'. This is generated from social security number and in case it is artificially generated by some reason the date of birth can not be generated.
VehHolderGender	H	Present when VehHolderLegalEntityCode='NP'. This is generated from social security number and in case it is artificially generated by some reason the gender can not be generated.
VehHolderPlaceOfBirth	-	
VehHolderPersonalIDNumber	-	
VehHolderPersonalIDTypeCode	-	
VehHolderPersonalIDTypeDesc	-	
VehHolderCompanyName	H	Present when VehHolderLegalEntityCode = 'O'
VehHolderCompanyIDNumber	H	Present when VehHolderLegalEntityCode = 'O'. Returns the Business ID (Business Identity Code) which is a code given to businesses and organisations by the Finnish authorities.
VehHolderCompanyIDTypeCode	H	Present when VehHolderLegalEntityCode = 'O'. The value is always 'CIN'.
VehHolderCompanyIDTypeDesc	H	Present when VehHolderLegalEntityCode = 'O'. The value is always 'Company identification number'.
VehHolderAddress		
VehHolderAddrStreetName	H	The StreetName also includes the street number and the P. O. Box when present in the Finnish Vehicle Register.
VehHolderAddrStreetNameExtra	H	Used if the street name do not fit to the VehHolderAddrStreetName.
VehHolderAddrStreetNumber	-	
VehHolderAddrStreetNrAnnex	-	
VehHolderAddrPostcode	H	
VehHolderAddrPlaceOfResidence	H	
VehHolderStartDate	H	
VehHolderEndDate	H	
VehHolderStatusCode	H	Used only when holder is found and no owner is found. When returned the value is always 'C' ('Unknown if the holder is also the owner.')
VehHolderStatusDesc	H	When returned the value is always 'Unknown if the holder is also the owner'. See VehHolderStatusCode.
VehHolderNameLine(s)	H	Holder's full name
VehHolderAddressLines	H	Holder's postal address in Finland
VehOwner		Owner is always present. When the start or end dates of the former ownership are not present in the Finnish Vehicle register the message warning about "Unverified data" is present indicating that the data can not not be verified.
VehOwnerLegalEntityCode	H	Only 'NP' and 'O' used.
VehOwnerLegalEntityDesc	H	Only 'Natural person' and 'Legal entity other than natural person' used.
VehOwnerSurname	H	Present when VehOwnerLegalEntityCode='NP'
VehOwnerOtherNames	-	
VehOwnerFirstName	H	Present when VehOwnerLegalEntityCode='NP'. All the first names of the person are returned.

VehOwnerMiddleName	-	
VehOwnerOtherName	-	
VehOwnerInitials	H	Present when VehOwnerLegalEntityCode='NP'. The initals are returned from every name present in the VehOwnerFirstName and the VehOwnerFirstName.
VehOwnerDateOfBirth	H	Present when VehOwnerLegalEntityCode='NP'. This is generated from social security number and in case it is artificially generated by some reason the date of birth can not be generated.
VehOwnerGender	H	Present when VehOwnerLegalEntityCode='NP'. This is generated from social security number and in case it is artificially generated by some reason the gender can not be generated.
VehOwnerPlaceOfBirth	-	
VehOwnerPersonalIDNumber	-	
VehOwnerPersonalIDTypeCode	-	
VehOwnerPersonalIDTypeDesc	-	
VehOwnerCompanyName	H	Present when VehHolderLegalEntityCode = 'O'
VehOwnerCompanyIDNumber	H	Present when VehHolderLegalEntityCode = 'O'. Returns the Business ID (Business Identity Code) which is a code given to businesses and organisations by the Finnish authorities.
VehOwnerCompanyIDTypeCode	H	Present when VehHolderLegalEntityCode = 'O'. The value is always 'CIN'.
VehOwnerCompnayIDTypeDesc	H	Present when VehHolderLegalEntityCode = 'O'. The value is always 'Company identification number'.
VehOwnerAddrStreetName	H	The StreetName also includes the street number and the P. O. Box when present in the Finnish Vehicle Register.
VehOwnerAddrStreetNameExtra	H	Used if the street name did not fit to the VehOwnerAddrStreetName.
VehOwnerAddrStreetNumber	-	
VehOwnerAddrStreetNrAnnex	-	
VehOwnerAddrPostcode	H	
VehOwnerAddrPlaceOfResidence	H	
VehOwnerStartDate	H	
VehOwnerEndDate	H	
VehOwnerNameLine	H	Owner's full name
VehOwnerAddressLine	H	Owner's postal address in Finland
VehInsuranceResponse		
VehRegistrationNumberPart1	H	
VehRegistrationNumberPart2	-	
VehRegistrationNumberPart3	-	
VehRegistrationNumberPart4	-	
VehIdentificationNumber	H	
VehInsurance		The insurance information is always present. When no data is present, the vehicle has no valid insurance.
VehInsCompanyName	H	
VehInsCompanyIDNumber	-	
VehInsCompanyIDTypeCode	-	
VehInsCompanyIDTypeDesc	-	
VehInsAddress		The insurance information is always present. When no data is present, the vehicle has no valid insurance.
VehInsAddrStreetName	-	

VehInsAddrStreetNameExtra	-	
VehInsAddrStreetNumber	-	
VehInsAddrStreetNrAnnex	-	
VehInsAddrPostcode	-	
VehInsAddrPlaceOfResidence	-	
VehInsNameLine	H	
VehInsAddressLines	-	
VehInsStartDate	H	
VehInsEndDate	H	
VehInsNumber	-	

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