

Version history

Version	Date	Description
1.0	19/02/2017	Document published.

KEY TERMS AND THEIR DEFINITIONS

Term	Definition
Anonymisation	Anonymisation aims to convert the data into such a format that it cannot be linked to a specific, natural person under any circumstances (even with the use of other available data). For example, the processing of personal data for irreversible conversion into a form that prevents any party from using it to identify the person either directly or indirectly.
Pseudonymisation	Pseudonymisation refers to converting data into an unrecognisable form that still enables the restoration of the original data with additional data or encryption keys.
GDPR	The EU-wide General Data Protection Regulation 2016/679 entered into force on 25 May 2018.

INSTRUCTIONS FOR THE ANONYMISATION OF TEST DATA

The purpose of these instructions is to provide stakeholders with the information required to anonymise test records. All records delivered by stakeholders to the Incomes Register must be anonymised in accordance with the requirements of these instructions. Stakeholders are required to anonymise their own records. The delivered records will not be anonymised again in the Incomes Register.

In addition to records, stakeholders can deliver their own business IDs and personal identification numbers to the Incomes Register for testing. The use of IDs provided by the Incomes Register is preferred in stakeholder testing. If a stakeholder wishes to deliver its own IDs for testing, they must be anonymised. The Incomes Register will not anonymise the IDs delivered by stakeholders. Stakeholders' business IDs or Finnish personal identification numbers that have not been delivered to the Incomes Register may not be used in testing.

Anonymisation refers to converting the records into a form that cannot be restored to the original with a certain value or, for example, an encryption key.

If it is possible to restore the values by combining various values or using an encryption key, the records have been pseudonymised. According to the GDPR, pseudonymised data that could be connected to a natural person on the basis of additional information is regarded as the personal data of identifiable natural persons.



Identifier (Code)

Type	Requirement	Reason for anonymisation
Business ID (Business ID)	The business ID must be completely changed. The converted business ID must be in the correct format.	There are microenterprises that only have one employee. In such cases, the person to whom the data is connected can be deduced from the business ID.
Personal Identification Number (Finnish) (Personal Identification Number (Finnish))	The individual number (last four characters) of the personal identification number must be changed. The personal identification number must remain formally correct after the individual number has been changed. The date of birth can be left unchanged.	People can be identified with their personal identification numbers.
VAT number (VAT) (VAT number (VAT))	VAT numbers are subject to the same requirements as business IDs, with the exception that the correctness of the VAT number is not checked. If the business ID is 0765432-1, the VAT number will be FI07654321.	Because the VAT number is generated from the business ID, it too must be anonymised as it may refer to an individual.
GIIN (GIIN)	The GIIN identifier does not have to be anonymised.	
Tax Identification Number (TIN) (Tax Identification Number (TIN))	If the tax identification number (TIN) is generated directly from the personal identification number or includes the personal identification	The TIN constitutes identifying data that can be used to identify individual persons.



	number, the date of birth does not have to be changed. The other parts of the TIN have to be changed.	
Finnish trade registration number (Finnish trade registration number)	The trade registration number must be completely changed.	A trade registration number can refer to a small enterprise, making it easy to identify individuals by combining the trade registration number with other data on the company.
Foreign business registration number (Foreign business registration number)	The foreign business registration number must be completely changed.	A foreign business registration number can refer to a small enterprise, making it easy to identify individuals by combining the foreign business registration number with other data on the company.
Foreign personal identification number (Foreign personal identification number)	The date of birth in a foreign personal identification number does not have to be anonymised. The other parts of the identification number must be changed (excluding the character corresponding to the characters "-" or "A" in Finnish personal identification numbers).	People can be identified by their foreign personal identification numbers.
Other identifier (Other)	If the identifier refers to a personal identification number, it is subject to the same anonymisation requirements as other personal identification numbers. If the identifier refers to a company	Other identifiers may contain data on individuals or companies.



	identifier, it must be anonymised so that the company cannot be identified.	
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Example, Personal Identification Number (Finnish):

Original value	Anonymisation	Result
211168-111J	The date of birth remains unchanged. The individual number in the personal identification number is anonymised so that the complete identification number will pass checks.	211168-5379

Example, Business ID:

Original value	Anonymisation	Result
0245458-3	The business ID is anonymised in a manner that preserves the correct format, i.e. the check digit is correctly calculated.	8351634-3

Name (Name), First name (FirstName), Last name (LastName), Representative's name (Name)

Several sections of the Incomes Register's data content include various name fields. The anonymisation requirements apply to all parts of the data content that deal with names. The name data of payers, income earners and representatives must be anonymised. An exception is the name of the testing contact person, which does not have to be anonymised.

Type	Requirement	Reason for anonymisation
First name (FirstName)	All first names must be changed.	A person's name is personal data by definition. An unusual name can be used to identify a person by itself.
Last name (LastName)	The entire last name must be changed.	
Name (Name)	Both the first and last names must be changed.	
Representative's name (Name)	Both the first and last names must be changed.	

Example, Name:

Original value	Anonymisation	Result
Erin Example	Both the first and last names must be changed. The names can be random character strings, or they can be picked from	Matt Myself



	a list of generated names.	
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Telephone number (Telephone)

Type	Requirement	Reason for anonymisation
Telephone number (Telephone)	The telephone number must be replaced with a random number. An exception is the telephone number of the testing contact person, which does not have to be anonymised.	A telephone subscription is registered in the name of either a company or an individual. The telephone number could be used to obtain information on the company or individual, making it possible to identify them.

Example, Telephone number:

Original value	Anonymisation	Result
0441234512	The telephone number is replaced with a random number.	1573810548

E-mail address (Email)

Type	Requirement	Reason for anonymisation
E-mail address (Email)	The e-mail address must be changed completely. Alternatively, the value can be deleted as it is not mandatory. An exception is the e-mail address of the testing contact person, which does not have to be anonymised.	E-mail addresses are personal data by definition.

Example, E-mail address:

Original value	Anonymisation	Result
Erin.Example@CompanyName.fi	The e-mail address is changed completely.	Matt.Myself@gie-owgn.fi



Street address (Street)

Type	Requirement	Reason for anonymisation
Street address (Street)	Both the street name and flat number must be changed in street addresses.	Because addresses can be used to search for the data of people living there, the street address must be changed.

Example, Street address:

Original value	Anonymisation	Result
Rantatie 1 C25	Both the street name and flat number must be changed.	Kampitus- katu 4

c/o (Co)

Type	Requirement	Reason for anonymisation
c/o (Co)	The street name, number and all names must be completely changed in address data.	The c/o information includes address information and possibly names.

Example, c/o:

Original value	Anonymisation	Result
Betty Bee c/o Matt Myself Rantatie 1 C25 00100 Helsinki	Both the street name and number are changed in the address details.	Karen Naples c/o Billy Bear Kampituskatu 4 00100 Helsinki

P.O. Box (POBox)

Type	Requirement	Reason for anonymisation
P.O. Box (POBox)	The P.O. box number must be changed to a random number with 1 to 4 digits.	The P.O. box number must be changed because, in certain cases, the details of the person using the post office box can be obtained by combining the postal code and P.O. box number.

Example, P.O. box:

Original value	Anonymisation	Result
P.O. Box 347	The P.O. box number must be changed to a random number with 1 to 4 digits.	P.O. Box 5321



Occupational class or title identifier (Code), Title (Title)

Type	Requirement	Reason for anonymisation
Occupational class or title identifier (Code)	The occupational class or title identifier must be replaced with another identifier from the list "Occupational class or title type (Type)".	In many cases, the occupational class can be highly identifying data. The list "Occupational class or title type (Type)" includes occupations with only a few practitioners, sometimes only one. It may therefore even be possible to identify a person on the basis of this information.
Title (Title)	Use the title chosen as the value for "Occupational class or title identifier (Code)".	

Example, Occupational class or title identifier:

Original value	Anonymisation	Result
00131	Another value is selected at random from the list "Occupational class or title type (Type)".	93100

Example, Title:

Original value	Anonymisation	Result
Senior secondary school lecturer	The Title is changed to correspond to the changed identifier.	Carpenter

Amount (Amount), Amount of deduction (Amount), Unit price (UnitPrice), One-off remuneration (OneOff)

Type	Requirement	Reason for anonymisation
Amount (Amount) Amount of deduction (Amount)	The amount must be changed. When changing the amount, care must be taken to ensure that it cannot be restored to the original value, i.e. the same formula may not be used to make all changes. The magnitude of the amount can be left similar to the original. The requirements of different income types affecting the	Exceptional income data, such as an uncommonly high salary, benefit, or one-off compensation, can be used to identify people.



	Amount (Amount) value in reporting earnings payment data are listed in the descriptions of the Amount (Amount) data in the documents "Wages – Codes – Income types" and "Data delivery – Schemas – Earnings payment reports". The equivalent data for benefits is found in documents "Benefits – Codes – Income types" and "Data delivery – Schemas – Benefits payment reports".	
Unit price (UnitPrice)	The unit price must be changed. When changing the unit price, care must be taken to ensure that it cannot be restored to the original value, i.e. the same formula may not be used to make all changes. The magnitude of the unit price can be left similar to the original.	
One-off remuneration (OneOff)	The one-off remuneration must be changed. When changing the one-off remuneration, care must be taken to ensure that it cannot be restored to the original value, i.e. the same formula may not be used to make all changes. The magnitude of the one-off remuneration can be left similar to the original.	

Example, Amount:

Original value	Anonymisation	Result
25000	The amount is changed to a different figure.	32560

Example, Unit price:

Original value	Anonymisation	Result
2000	The unit price is changed to a different figure.	2105

Example, One-off remuneration:

Original value	Anonymisation	Result
17500	The one-off remuneration is changed to a different figure.	6312

Principal's name (Name), Company name (CompanyName), Employer name (EmployerName)

Type	Requirement	Reason for anonymisation
Principal's name (Name)	If the name of the principal or employer refers to the name of	



Company name (CompanyName)	a person, both the first and last names must be changed. The company name must be changed.	A person's name is personal data by definition. An unusual name can be used to identify a person by itself. A company may only have one employee, in which case the company name could be used to identify a person.
Employer name (EmployerName)		

Example, Principal's name/Company name/Employer name:

Original value	Anonymisation	Result
Erin Example	Both the first and last names must be changed. The names can be random character strings, or they can be picked from a list of generated names.	Matt Myself
Erin's Park Benches Ltd	The whole name of the company must be changed so as to be unrecognisable.	Matt's Shoe Maintenance Ltd

Occupational accident insurance policy number (AcclnsPolicyNo)

If the tester has anonymised the background data of the occupational accident insurance policy number in their testing environment, the occupational accident insurance policy number need not be anonymised.

Insurance policy number or other identifier (InsuranceNo)

If the tester has anonymised the background data of the insurance policy number or other identifier in their testing environment, the insurance policy number or other identifier need not be anonymised.

