

**PROTOCOL REGARDING THE IMPLEMENTATION OF THE AGREEMENT
BETWEEN THE GOVERNMENT OF THE REPUBLIC OF ESTONIA AND THE
GOVERNMENT OF THE REPUBLIC OF FINLAND ON POPULATION
REGISTRATION**

In order to arrange the exchange of personal data between the population registers and to clarify and ensure that agreement provisions are interpreted uniformly and consistently, the Ministry of the Interior of Estonia and the Digital and Population Data Services Agency of Finland (hereinafter referred to individually as “the Contracting Party” or together as “the Contracting Parties”) have on the basis of the Agreement between the Government of the Republic of Estonia and the Government of the Republic of Finland on Population Registration (hereinafter “the Governmental Agreement”) agreed as follows:

Section 1

Scope of the Protocol

1. According to articles 11, 12, 14 and 15 of the Governmental Agreement, this Protocol includes the practical procedures and technical solutions related to the disclosure of data as well as arrangements on the introduction of the disclosure of data and the information of the schedules for starting the different phases of the data exchange in order to ensure the implementation of the Governmental Agreement by the Contracting Parties.
2. Certain technical and practical matters concerning data systems to be used, contacts and other such things will, when mentioned in this Protocol below, be detailed and kept up to date in a separate annex (Annex 1: Detailed Information Annex), which is considered part of this Protocol and will be kept available to both Contracting Parties in an electronic document repository.
3. The Detailed Information Annex according to paragraph 2 of this section can be changed when the Contracting Parties have mutually agreed on it in writing for example by email or letter or in the Minutes of a Meeting between the Contracting Parties. Changes to the Detailed Information Annex do not constitute amendments of the Protocol’s text.

Section 2

Interpretation of articles 8 and 15 in the Governmental Agreement

1. The Contracting Parties agree that there is a need to clarify the interpretation of some provisions in articles 8 and 15 of the Governmental Agreement. The Contracting Parties agree that this clarification does not constitute an amendment of the Governmental Agreement’s text, but only means setting down in writing the mutually agreed interpretation of the Governmental Agreement’s text.
2. According to article 15 paragraph 5 of the Governmental Agreement, the Contracting Parties of this Protocol have the right to agree on when the notifications and registration of data under Chapter II of the Governmental Agreement will commence, and when the measures provided for in articles 8 and 9 of the Governmental Agreement are to be carried out.
3. The provisions in article 15 paragraph 5 of the Governmental Agreement shall be interpreted as meaning that the actual application of Chapter II of the Governmental Agreement starts only at the time agreed in section 7 of this Protocol.

4. The measures provided for in articles 8 and 9 of the Governmental Agreement are taken in order to commence the procedures under Chapter II of the Governmental Agreement. Therefore, these measures must be carried out only when the application of Chapter II of the Governmental Agreement starts.

5. Thus, the date of entry into force referred to in article 8 of the Governmental Agreement is to be interpreted as the start date of the application of Chapter II of the Governmental Agreement as agreed in section 7 of this Protocol.

Section 3

Other matters of interpretation of the Governmental Agreement

Other matters of interpretation of the Governmental Agreement are governed by an Interpretation Description, which is an annex to this Protocol (Annex 2: Interpretation Description Annex). The annex will be kept available in the electronic document repository and can be changed when the Contracting Parties have mutually agreed on it in writing for example by email or letter or in the Minutes of a Meeting between the Contracting Parties. Changes in the Interpretation Description Annex do not constitute amendments of the Protocol's text.

Section 4

Means and service level of the data exchange

1. The exchange of personal data under the Governmental Agreement shall be carried out through the X-Road. When this is not possible, the data exchange can be carried out through other secure data communication channels by mutual approval of the Contracting Parties. These will be detailed in the electronic document repository.

2. The Contracting Parties shall deliver data under articles 6, 7, 10 and 11 of the Governmental Agreement at least once every working day. As working days shall count the days that are official working days for the state authorities in Estonia, when considering data delivered by Estonia. As working days shall count the days that are official working days for the state authorities in Finland, when considering data delivered by Finland.

3. In case of planned or unplanned service interruptions, the Contracting Party on whose side the service is interrupted must inform the other Contracting Party of the interruption as soon as possible after the interruption has been decided or discovered. Regularly occurring service interruptions will be detailed in the electronic document repository.

4. When delivering data under article 11 paragraph 3 or article 12 of the Governmental Agreement, the data shall be sent in encrypted format through such secure data communication channels which are detailed in the electronic document repository.

Section 5

Information on contact persons

1. The Contracting Parties shall inform each other about the e-mail address or addresses to be used for communication between the Contracting Parties about technical topics, including but not limited to service interruptions and changes in the technical solutions.

2. The Contracting Parties shall also inform each other about the e-mail address or addresses to be used for communication between the Contracting Parties on non-technical topics, including but not limited to individual cases and general policy questions.

3. The information in this article shall be detailed in the electronic document repository. Any changes in the contact information shall be entered in the electronic document repository as soon as the change is decided.

Section 6

The documentation of the technical solutions

1. Documentation of the technical solutions for the data exchange and their service levels shall be detailed in the electronic document repository.

2. The other Contracting Party shall be informed well in advance and at least six months before making changes to the technical solutions that affect the other Contracting Party.

3. Any changes to the detailed documentation of the technical solutions for the data exchange shall be approved by both Contracting Parties in writing.

Section 7

Schedules for starting the different phases of the data exchange

1. The exchange of death data referred to in article 15 paragraph 6 of the Governmental Agreement shall commence on 15th April 2025.

2. Application of Chapter II of the Governmental Agreement shall commence on 2nd December 2025.

3. The process and data exchange for determining place of residence, provided for in articles 8 and 9 of the Governmental Agreement, shall be carried out as soon as possible after the application of Chapter II of the Governmental Agreement has commenced.

4. The schedules of the following phases of data exchange according to Chapter III of the Governmental Agreement shall be agreed later in a separate Protocol or by amending this Protocol.

Section 8

Entry into force and termination of the Protocol

1. This Protocol shall enter into force when both Contracting Parties have signed it. The Protocol is concluded for an indefinite period of time.

2. This Protocol may be amended by mutual written consent of the Contracting Parties.

3. This Protocol shall cease to have effect when the Governmental Agreement ceases to be in force.

Done in duplicate in Tallinn this 20th day of February 2025 in English.

For the Ministry of the Interior of the
Republic of Estonia



Enel Pungas
Head of the Population Facts Department

For the Digital and Population Data
Services Agency of Finland



Timo Salovaara
Deputy Director General, Services Division



Torbjörn Sandell
Senior Specialist