



## **Privacy notice**

EU General Data Protection Regulation (2016/679), Articles 13 and 14

# **Processing of personal data in the City of Helsinki's feedback services and digital participation services**

## **Controller**

City of Helsinki / City Board

## **Person in charge of the register**

City Executive Office / Communications Department / Communications Director

## **Why do we process your personal data?**

The purpose of processing personal data is to facilitate participation and influencing opportunities for the residents of the municipality and City employees. The City's feedback channel enables municipality residents to submit fault reports and feedback on the City's activities. The digital participation channels are used to collect comments, opinions and development suggestions from municipality residents and City employees regarding matters and services being prepared.

## **Legal basis of processing**

The legal basis with regards to the feedback service is Article 6(1)(c) of the EU General Data Protection Regulation: processing is necessary for compliance with a legal obligation to which the controller is subject. The City has a statutory obligation (Administrative

Procedure Act, Chapter 2, Section 8) to, within its competence, provide its customers, as necessary, with advice on dealing with administrative matters and respond to questions and enquiries concerning the use of its services. If a matter does not fall within the competence of the City, it shall seek to refer the customer to the competent authority. Furthermore, processing is required in order to make it possible for residents and service users to influence the City's activities by submitting feedback. A municipality's residents and service users have the right to participate in and influence the activities of the municipality (Local Government Act, Chapter 5, Section 22).

The legal basis with regard to the City's participation services for residents is Article 6(1)(a) of the EU General Data Protection Regulation: the data subject has given consent to the processing of their personal data for one or more specific purposes. Participation is voluntary for residents. The user can choose to log in to the City's feedback and KerroKantasi services.

The legal basis for the City's participation and influencing services for employees is Article 6(1)(e) of the EU General Data Protection Regulation: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

### **Essential legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Local Government Act (410/2015), Section 22
- Administrative Procedure Act (434/2003), Section 41
- Act on the Openness of Government Activities (621/1999)

## **Which personal data do we process?**

The personal data collected varies by participation channel. Each participation and feedback service features a section explaining which personal data is collected in the service.

The participation and feedback services primarily collect individualisation and contact details provided by the data subject themselves. These include the person's name, email address and phone number. The server also collects users' IP addresses in case misuse situations need to be investigated.

The user can also use strong authentication when logging in to the feedback service, whereby the service records the person's name, email address and personal identity code.

When a user logs in to the KerroKantasi service by using their Helsinki profile, their name, email address and individual identifier are recorded.

Data subjects are not requested to provide specific personal data, but if a data subject provides such data, it is processed as stipulated in Article 9 of the EU General Data Protection Regulation.

## **How do we collect personal data?**

Personal data is collected from data subjects themselves when they submit feedback or log in to the service, provided that the service in question facilitates this.

Users can choose to log in to the KerroKantasi service by using their Helsinki profile.

The data collected in the voluntary strong authentication process used in the feedback service is obtained via the Suomi.fi service.

If a user wants to log in to the service as a City employee, they can do so with the City's AD credentials.

## **To whom do we disclose your personal data?**

No personal data is disclosed.

## **Processors of personal data**

In the City's digital participation services, the party processing personal data is the technical supplier of each service or the City of Helsinki's contract suppliers.

The City may outsource the processing of your personal data to an external system supplier or service provider based on a separate agreement. In such a case, the personal data is processed on behalf of the City and to fulfil a purpose determined by the City. The City remains the controller of your personal data. The City and the service provider are jointly responsible for the appropriate processing of your personal data.

## **Is your personal data transferred outside the EU or EEA?**

No personal data processed in the feedback service is transferred outside the EU or the EEA.

Personal data collected in the digital participation services may be transferred outside the EU or the EEA.

By default, the City of Helsinki ensures that your personal data is processed within the EU or the EEA. However, in some cases, the City's services or functions may also be implemented by a service provider located somewhere else, by using services and servers. In such a case, your personal data may be transferred outside the EU or the EEA as well. The General Data Protection Regulation sets strict criteria for transferring data to countries whose legislation concerning the processing of personal data deviates from the requirements of European data protection legislation. In such cases, the City of Helsinki commits to adhering to the requirements set for an adequate level of personal data protection and, where applicable, commits its system suppliers and service providers to take care of similar data protection obligations, as prescribed in data protection legislation.

## **How long do we retain your personal data?**

Residents' feedback and personal data are retained for (5) years, after which they are removed and anonymised.

Personal data collected through the City's other participation channels is retained for five (5) years.

## **How do we protect your personal data?**

We process all personal data in a manner that is safe and meets statutory requirements. We have carefully assessed the potential risks related to our processing procedures and have carried out appropriate risk management procedures.

## **Automated decision-making and profiling**

Your personal data will not be used for automated individual decisions or profiling purposes.

## **Rights concerning the processing of your personal data**

Rights of data subjects and instructions on how to exercise them can be found from:

<https://www.hel.fi/fi/paatoksenteko-ja-hallinto/tietoa-helsingista/tietosuoja-ja-tiedonhallinta/tietosuoja/rekisteroidyn-oikeudet-ja-niiden-toteuttaminen>

### **Right of access, Article 15**

You have the right to know whether your personal data is processed and what data is stored about them. The City of Helsinki will provide the information without undue delay, at the latest within one month of receiving the request. If necessary, this period may be extended by a maximum of two months if the request is of exceptional scope and complexity. If the time limit is extended, the city will inform the person requesting the

information of this within one month of receiving the request, as well as of the reasons for the delay.

### **Right to rectification, Article 16**

You have the right to demand that the city rectify imprecise and inaccurate personal data concerning you without undue delay. In addition, you have the right to the supplementation of incomplete information. Any incompleteness of the data will be resolved by taking into account the purpose of the processing of personal data in the register. If the city does not accept the person's demand for rectification, it will issue a written certificate stating the reasons the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies is also mentioned in connection with the certificate.

### **Right to erasure, right to be forgotten, Article 17**

In some exceptional cases – for example, if the processing of data has been based on the person's consent and the person withdraws their consent – the person has the right to have their data erased, or in other words, to be forgotten. If the city does not accept the person's demand for erasure, it will issue a written certificate stating the reasons the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies is also mentioned in connection with the certificate. The right to erasure does not exist if the processing is based on compliance with the city's statutory obligation, or it is related to the performance of a task carried out in public interest or the exercise of public authority vested in the city.

### **Right to restriction of processing, Article 18**

In certain situations, a person may have the right to request that the processing of their personal data be restricted until their data has been duly checked and corrected or supplemented. Such situations include a person denying the accuracy of their data, in which case the processing of their data is restricted for the time the city checks their accuracy.

### **Right to data portability, Article 20**

A person has the right to transfer their personal data from one controller to another if they have themselves provided the controller with their personal data, and the processing of the data is based on consent or a contract, and the processing is carried out automatically. This right does not apply to processing that is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in the city.

### **Right to object, Article 21**

A person has the right to object at any time on grounds related to their personal situation to the processing of their personal data where the processing is based on the performance of a task carried out in the public interest or in the exercise of an official authority vested in the city. In this case, the data may be further processed only if there is a substantial and justified reason for the processing that can be demonstrated by the city. The processing may also continue if the processing is necessary for the establishment, exercise or defence of legal claims.

### **Right to lodge a complaint with an authority, Article 77**

A person has the right to lodge a complaint with the supervisory authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement, if they consider that the processing of personal data concerning them infringes the EU General Data Protection Regulation. In Finland, this supervisory authority is the Data Protection Ombudsman. In addition, a person has the right to exercise other administrative and judicial remedies.

### **Notifying the supervisory authority**

You can notify the supervisory authority if you suspect that the processing of your personal data is in violation of data protection regulations. In addition, you have the right exercise other administrative and judicial remedies.

## [Office of the Data Protection Ombudsman](#)

Visiting address: Lintulahdenkuja 4

Postal address: PL 800, 00531 Helsinki

Email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Switchboard: 029 56 66700

## **How can you contact us for questions related to data protection?**

### **Contact persons for the register**

Feedback: City Executive Office / Communications Department / Project Manager

Digital participation channels: City Executive Office / Communications Department /  
Development Manager

Digital participation channels for employees: City Executive Office / Strategy Department /  
Product Owner

### **Contact information**

Register Office, City of Helsinki

[helsinki.kirjaamo@hel.fi](mailto:helsinki.kirjaamo@hel.fi)

+358 9 310 13700

### **Contact information of Data Protection Officer**

Data Protection Officer of City of Helsinki

[tietosuoja@hel.fi](mailto:tietosuoja@hel.fi)

+358 9 310 1691 (switchboard)

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