



Privacy notice

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

Promotion of integration privacy notice (Employment Services Enterprise)

Joint controllers

City of Helsinki/Employment Services Enterprise Board.

Development and Administration Centre for ELY Centres and TE Offices
(KEHA Centre)

This notice pertains to the processing of personal data by the City of Helsinki. Information on the processing of information on job applicant clients is also provided in the public employment services privacy notice.

According to the Employment Services Enterprise Board's decision 2.1.2025 § 6 regarding the competence related to the duties and tasks of the controller, the person in charge of the register is the Managing Director.

Why do we process your personal data?

The promotion of integration requires the processing of your data.

In accordance with section 72(1) of the Act on the Promotion of Immigrant Integration, the information on immigrants and integration clients may be processed for the purpose of:

1) organising and carrying out services and duties specified in the Act on the Promotion of Immigrant Integration;

2) supervising, developing, monitoring, evaluation, statistical reporting, forecasting and guidance related to the duties specified in section 1; and

3) statistical reporting and knowledge-based management related to the duties specified in section 1.

The aforementioned services and duties that are the responsibility of the Employment Services Enterprise are, in accordance with Chapter 2 of the Act on the Promotion of Immigrant Integration, the arrangement of the service process, assessment of the need for expertise and integration services, and duties related to the integration plan.

Legal basis for processing

In connection with performing tasks, personal data will be processed based on:

- 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. The consent may be used in a manner supplementing the statutory processing of personal data in situations in which there is no statutory basis. Consent may be sought, for example, if the data is disclosed to the service provider and the service has not been specified in the integration plan. In such a case, data necessary for the organisation of the service is disclosed to the service provider.
- 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. On this basis, all data pertaining to a personal client mentioned in the chapter 'Which personal data do we process?' may be processed.

Key legislation

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Openness of Government Activities (621/1999)
- Act on the Promotion of Immigrant Integration (681/2023)

Which personal data do we process?

According to Section 73 of the Act on the Promotion of Immigrant Integration, the following data of a personal client may be processed:

- 1) personal identity code;
- 2) name and contact details;
- 3) information on a residence permit application and decision;
- 4) service language, the need for interpretation services and other information on arranging access to the service;
- 5) information on education, employment history and professional expertise and other information used as the basis for the assessment of the need for expertise and integration services or the need for multisectoral expertise and integration services;
- 6) information on the assessment of the need for expertise or integration services or the assessment of the need for multisectoral expertise and integration services, the service content and duration of validity of the integration plan or the multisectoral integration plan and other plans, and information on the implementation of the plans;
- 7) information on services that promote integration, the final language skills tests and follow-up in the form of other services;
- 8) any such information and assessments pertaining to health and work and functional ability that have an impact on the person's integration and are necessary for providing the person with services;
- 9) information on assignment to a municipality as specified in Section 43; and
- 10) information on compensation as specified in Chapter 8.

How do we collect personal data?

Personal data for the register is obtained from the data subject and accumulated in the register in various service situations, e.g. when accessing the online services, by telephone, via secure email and in in-person encounters.

Employment Services may receive information as a disclosure by other authorities and service providers as specified in Sections 84–86 of the Act on the Promotion of Immigrant Integration.

To whom do we disclose your personal data?

Employment Services may disclose the data of the client to other authorities as specified in Sections 85–86 of the Act on the Promotion of Immigrant Integration.

Public or private educational institutions and other service providers the integration client is referred to in accordance with the integration plan as specified in Chapter 2 of the Act on the Promotion of Immigrant Integration have the right to receive, without charge and notwithstanding non-disclosure regulations, the following information on the integration client, their integration plan and need for services from the municipality, employment authority and the aforementioned service providers in order to carry out the duties specified in Chapter 2:

- 1) names;
- 2) date and location of birth;
- 3) personal identity code;
- 4) native language;
- 5) service language;
- 6) citizenship, lack of citizenship and nationality;
- 7) domicile and place of residence;
- 8) contact information;
- 9) official's name;

- 10) the date of preparing and the validity of an integration plan;
- 11) records of completed education and other reviews related to education that have been brought up in connection with the assessment of the need for expertise and integration services;
- 12) the result of a baseline language skills test;
- 13) previous education or degree;
- 14) previous profession or work experience;
- 15) the client's preferred profession;
- 16) the study plan for any previous education or training that promotes integration and an assessment of the implementation thereof;
- 17) the measures and goals for the future set in any previous training or education that promotes integration; and
- 18) other information necessary for participating in or accessing training or services not specified in sections 1–17.

Some of the client information may have been ordered to be retained permanently by the National Archives in accordance with the Archives Act (831/1994). The data ordered to be retained permanently will be transferred to the National Archives after it has been removed from the client information system.

Client data will be disclosed to other authorities if the disclosure is prescribed by law or the client has given their consent for the disclosure. The content of the information to be disclosed will be determined based on the right of access to the information of the authority requesting the information.

Processors of personal data

The City may outsource the processing of your personal data to an external system 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?

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 also be transferred to a location outside the EU or the EEA, such as the United States. 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 adhering to similar data protection obligations, as prescribed in data protection legislation.

How long do we retain your data?

In accordance with Section 77 of the Act on the Promotion of Immigrant Integration, all data on the client will be deleted four years after the end of the client relationship. However, the data does not need to be deleted if it is necessary for carrying out a legal duty or a pending case.

Some of the client information may have been ordered to be retained permanently by the National Archives in accordance with the Archives Act (831/1994). The data ordered to be retained permanently will be transferred to the National Archives after it has been removed from the client information system. The KEHA Centre is responsible for removing the documents entered into the aforementioned system and documents submitted via the E-services.

The City of Helsinki is the independent creator of archives insofar as the information in question is not contained in the aforementioned systems or documents submitted via them. In connection with its tasks, the City will be responsible for archiving the documents it receives and generates in accordance with the Archives Act. Documents received and generated by the City will be processed and archived in accordance with the City's data management plan.

Automated decision-making and profiling

We will not use your data for automated decision-making or profiling.

Rights concerning the processing of your personal data

The rights of data subjects and instructions on how to exercise them can be found at:

<https://www.hel.fi/en/decision-making/information-on-helsinki/data-protection-and-information-management/data-protection/rights-of-data-subjects-and-exercising-these-rights>

Right of access (Article 15)

You have the right to know whether your personal data is processed and what data is stored about you. The City of Helsinki will provide you with 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 inaccurate and incorrect personal data concerning you without undue delay. In addition, you have the right to the supplementation of incomplete data. Any incompleteness of the data will be resolved by taking into account the purpose of the processing of the personal data in the register. If the City does not accept the person's demand for rectification, it will issue a written statement stating the reasons why the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned with the statement.

Right to erasure, right to be forgotten (Article 17)

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 the public interest or the exercise of public authority vested in the City. In some exceptional cases – e.g. 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, i.e. to be forgotten. If the City does not accept the person's demand for erasure, it will issue a written statement stating the reasons why the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned with the statement.

Right to restriction of processing (Article 18)

The personal client's right to restriction of processing is limited in Section 73(3) of the Act on the Promotion of Immigrant Integration. A registered personal client does not have the right to restrict the processing of the data in the register in accordance with Article 18. The limitation in question is a limitation of the data subject's rights set separately through legislative procedures in accordance with Article 23. In other respects, the data subject's rights are applied normally.

Right to data portability (Article 20)

The right to transfer personal data from one system to another is not applied when the processing is based on a public obligation. For this reason, this right does not apply to processing that is necessary for the fulfilment of a public obligation or the performance of a task carried out in the public interest, or in the exercise of an official authority vested in the City. The right to transfer data from one controller to another pertains to situations in which the person themselves has provided the controller with their personal data, and the processing of the data is based on consent or an agreement, and the processing is carried out automatically.

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 continue to be 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. The right to object does not exist when personal data is processed based on other grounds, such as the fulfilment of a statutory obligation.

Right to lodge a complaint with an authority (Article 77)

You have the right to lodge a complaint with the supervisory authority if you consider the processing of personal data concerning you to infringe the EU General Data Protection Regulation (EU) 2016/679. You also have the right to exercise other administrative and judicial remedies.

[Office of the Data Protection Ombudsman](#)

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Email: tietosuoja@om.fi

Switchboard: +358 29 56 66700

How can you contact us regarding questions related to data protection?

In matters related to data protection, contact the Helsinki Employment Services' lawyer (Employment Services Enterprise).

Person in charge

Employment Services Enterprise/Managing Director.

According to the Employment Services Enterprise Board's decision 2.1.2025 § 6 regarding the competence related to the duties and tasks of

the controller, the person in charge of the register is the Managing Director.

Contact information

City of Helsinki

Contact information

Email address: helsinki.kirjaamo@hel.fi

Postal address: PO Box 10

00099 CITY OF HELSINKI

Street address: Pohjoisesplanadi 11–13

Tel.: +358 9 310 13700

The opening hours of the Register Office are Monday to Friday 8.15–16.00.

KEHA Centre: tietosuoja.keha@ely-keskus.fi

Data Protection Officer contact information

Data Protection Officer of the City of Helsinki

tietosuoja@hel.fi

+358 9 310 1691 (switchboard)

This privacy notice was updated on 13 December 2024.