



## **Privacy notice**

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

## **Public employment services 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.

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 provision of public employment services requires the processing of your data. The payment of the unemployment benefit also requires the processing of your data, as employment service providers have duties pertaining to the unemployment benefit.

In accordance with Section 112(1) of the Act on the Organisation of Employment Services, the data of clients and the providers of employment services can be used for:

1) organising and carrying out the services and duties specified in the Act on

the Organisation of Employment Services;

2) carrying out the duties of employment authorities specified in the Act on the Promotion of Immigrant Integration, the Unemployment Security Act, the Act on Rehabilitative Work, the Act on the Social Insurance Institution of Finland's Rehabilitation Benefits and Rehabilitation Allowance Benefits and the Act on a Limited Liability Company Called Työkanava;

3) supervising, developing, monitoring, statistical reporting, forecasting and guidance related to the aforementioned duties.

According to Section 11(1) of the Act on the Multisectoral Promotion of Employment, employment authorities may process data pertaining to an unemployed person for the purpose of carrying out duties specified in the act and related to the multisectoral joint operating model and the supervising, developing, monitoring, evaluation, statistical reporting, forecasting and guidance related to these duties.

### **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 is used in a manner supplementing the statutory processing of personal data in situations in which there is no statutory basis. The consent is used in situations such as those in which data is disclosed to the provider of a service supporting employment without the service having been agreed upon in the employment plan or another corresponding plan. In such a case, data necessary for the organisation of the service is disclosed to the service provider. Consent is also requested in situations pursuant to Section 118 of the Act on the Organisation of Employment Services when data necessary for filling a job vacancy is disclosed to an employer.
- 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.

- Phone conversations between the personal client and the advisory service will be recorded based on 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.

### **Key legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Organisation of Employment Services (380/2023)
- Unemployment Security Act (1290/2002)
- Act on the Promotion of Immigrant Integration (681/2023)
- Act on Rehabilitative Work (189/2001)
- Act on the Multisectoral Promotion of Employment (381/2023)
- Act on the Application of European Union Legislation Concerning the Coordination of Social Security Systems (352/2010)

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

In accordance with Section 114(1) of the Act on the Organisation of Employment Services, the following data pertaining to a personal client may be processed:

- 1) personal identity code;
- 2) name and contact details;
- 3) information on to the client relationship with Employment Services, accessing the services of the employment authority or Development and Administration Centre and any special arrangements required for accessing the services;
- 4) information on education and training, employment history and vocational skills and other data used in employment services;

- 5) information on service needs, plans and implementation of plans;
- 6) information on employment and training offers and presentations to potential employers;
- 7) information on public employment services, employment promotion services as specified in the Unemployment Security Act, other services supporting job seeking and employment and expert assessment;
- 8) any such information on and assessments of health, work capacity and functional ability that have an impact on the person's potential employment and are necessary for providing the person with services;
- 9) statements related to unemployment security, labour policy statements and other statements and notifications; this information and the information required for issuing a labour policy statement or other statement may also be processed if the natural person is not a personal client;
- 10) information on benefits covered by the public employment services.

Identifying information regarding the employer's representative may be processed in the case of an employer or business applying for or receiving public employment services.

Identifying information on the representative of the provider of employment services may be processed.

The following information may be processed for the purposes specified in section 11(1) of the Act on the Multisectoral Promotion of Employment in accordance with Section 11(2) of the act:

- 1) name, personal identity code and contact details;
- 2) information related to the client relationship in accordance with the multisectoral joint operating model, accessing the services and any special arrangements required to access the services;

- 3) information on education and training, employment history and vocational skills;
- 4) any information on the person's social situation that has an impact on the person's potential employment and is necessary for providing the services;
- 5) any such information and assessments pertaining to health and work and functional ability that have an impact on the person's potential employment and are necessary for providing the person with services;
- 6) information on service needs that has an impact on the person's potential employment;
- 7) information on the multisectoral employment plan and its realisation, monitoring and adjustments.

Additionally, phone conversations between the personal client and the advisory service will be recorded in order to verify the use of phone services and improve the quality of the services.

### **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.

Information may be received by being disclosed from a personal register of another employment authority, other municipal authority, a government authority, a wellbeing services county, the Social Insurance Institution of Finland, an unemployment fund, the Finnish Centre for Pensions, the Employment Fund, a provider of employment services, other provider of employment support services arranged by the employment authority as specified in the employment plan or another corresponding plan and an organiser of a work try-out (Section 115(1) of the Act on the Organisation of Employment Services).

In addition to the above, the employment authority has the right to receive, in

order to investigate the grounds for granting employment subsidy for people over 55 and pay subsidy, as specified in Chapter 10 of the Act on the Organisation of Employment Services, information on any solutions as specified in Section 83(3)(4) of the Act on the Organisation of Employment Services (section 115(2) of the Act on the Organisation of Employment Services) from the fine register, as specified in Section 46 of the Act on the Enforcement of a Fine (672/2002).

Information related to job offers and personal recruitment solutions is obtained from employers.

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

We may provide employers with information that is necessary for filling a job vacancy only with the jobseeker's written consent. The information necessary for filling a job vacancy is listed in Section 118(1) of the Act on the Organisation of Employment Services, according to which the information necessary for filling a job vacancy is:

- 1) the jobseeker's name and contact information, native language, other language skills and nationality;
- 2) the jobseeker's education status and vocational qualifications, as well as the content and grades thereof where necessary;
- 3) work history and the information provided in the work certificate;
- 4) the performance of military service;
- 5) special skills, work and education wishes, as well as the jobseeker's own job-seeking presentation for employers;
- 6) the information that the person has been an unemployed jobseeker for the past 12 consecutive months, as required for fulfilling the requirement for concluding a fixed-term employment agreement in accordance with Chapter 1, Section 3(a) of the Employment Contracts Act and Chapter 1, Section 4(a) of the Seafarers' Employment Contracts Act.

Information related to the jobseeker's state of health may only be disclosed to the employer if the jobseeker gives their individualised written consent and the information is necessary for filling a job vacancy or fulfilling the specific health requirements of the field of profession in question or promoting the employment of a jobseeker whose disability or illness hinders their employment.

The employer also has the right to know whether a former employee specified by the employer is registered as a jobseeker with the employment authority when fulfilling the re-employment obligation set in the Employment Contracts Act.

In order to fulfil the employment obligation to the municipality the employment obligation applies to in accordance with section 108 of the Act on the Organisation of Employment Services, the employment authority must disclose the grounds for the obligation and the information on the person to be employed related to their education and work experience and other information necessary for employment as specified in subsections 2 and 3.

The employment authority, the Social Insurance Institution of Finland, unemployment funds and foreign institutions authorised to process tasks related to the person's job-seeking and unemployment security have the right to mutually exchange information related to job-seeking and unemployment security that has an impact on the person's right to receive the unemployment benefit (Chapter 11, Section 4(b) and Chapter 13, Section 1(3) of the Unemployment Security Act, Act on the Application of European Union Legislation Concerning the Coordination of Social Security Systems).

The information may also be disclosed to the provider of employment services and the provider of employment support services specified in the employment plan or a corresponding plan if the information is necessary for the production and provision of the service. However, any information on the client's state of health may be disclosed to the service provider only if the client gives their individualised written consent for the disclosure of the information (Section 116(4) of the Act on the Organisation of Employment Services).

Some of the client information has 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 122 of the Act on the Organisation of Employment Services, all data on the client and the service provider are deleted from the national database after four years from the end of the client relationship or contractual relationship. However, the data will not be removed if it is necessary for performing a task based on regulations or due to a pending matter.



Recordings of phone conversations between personal clients and the advisory service will be removed six months after their recording.

Some of the client information has 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)**

Legislation pertaining to public employment services limits a personal client's right to restrict the processing. 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](#)

Street address: Lintulahdenkuja 4

Postal address: PO Box 800, 00531 Helsinki

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