

Privacy notice

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

Processing of personal data in the City of Helsinki's recruitment processes

Controller

City of Helsinki / City Board

Person in charge of the register

City Executive Office / Human Resources / Head of the Availability of Personnel and Employer Image Unit

Why do we process your personal data?

We process personal data for the purpose of filling the City's vacancies, offering work to City employees subject to reassignment, sending alerts about new vacancies that applicants have expressed interest in using the saved search function and sending a survey on the applicant experience to people who have applied for a job at the City of Helsinki in order to develop the recruitment process.

Legal basis of processing

The legal basis of processing personal data is Article 6(1)(b) of the EU General Data Protection Regulation: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. The legal basis of processing personal data 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.

Essential legislation

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Protection of Privacy in Working Life (759/2004)
- Act on Civil Servants in Local Government (304/2003), Section 4
- Employment Contracts Act (55/2001)
- Act on Equality between Women and Men (609/1986)
- Local Government Act (410/2015)

Which personal data do we process?

We process the following personal data on job applicants and City employees subject to reassignment: identifying and contact information; information on education, language skills, work experience and competence; applicants' video interviews and free-form presentations; and applicants' saved search settings pertaining to what kinds of jobs they are interested in.

Furthermore, the process of recruiting supervisors and managers utilises recruitment methods such as personal evaluation, operating style charting or reference requests, the purpose of which is to chart matters such as assessments of the applicant's competence, operating methods or previous work experience.

How do we collect personal data?

The data is collected from the data subject themselves or their referees in connection with the recruitment or reassignment process.

To whom do we disclose your personal data?

No personal data is disclosed.

Processors of personal data

In some cases, the City outsources 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.

The following service providers/system suppliers process personal data in the City of Helsinki's recruitment processes:

Grade Solutions Oy – recruitment system Talogy (Finland) Oy – charting of supervisors' operating style Talentwise Oy – digital reference processing Psycon Oy – personal evaluations and services supporting recruitment MPS Career Oy – personal evaluations and services supporting recruitment Ryhmittymä Bravedo Oy – personal evaluations and services supporting recruitment Eezy Personnel Oy – personal evaluations and services supporting recruitment

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 be transferred outside the EU or the EEA as well, 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 take care of similar data protection obligations, as prescribed in data protection legislation.

How long do we retain your personal data?

The application of a selected applicant is retained permanently, while other applications are retained for two (2) years from the filling of the vacancy.

Other reports produced by support measures potentially used to support the selection process (e.g. personal evaluations, reference reports) are retained by the City for the duration of the processing of the recruitment process, after which the reports are destroyed. The City has agreed on a two-year retention period with its service providers.

Data covered by the City's obligation to offer work is retained for as long as the person is covered by the obligation to offer work.

Automated decision-making and profiling

Your personal data will not be used for automated 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-jatiedonhallinta/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: <u>tietosuoja@om.fi</u> Switchboard: 029 56 66700

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

rekrytointipalvelut@hel.fi

Contact person for the register

The contact person for the register is the Development Manager of the Recruitment Services team of the Availability of Personnel and Employer Image unit.

Contact information

City of Helsinki, Register Office PO Box 10 (Pohjoisesplanadi 11–13) 00099 City of Helsinki

Contact information of Data Protection Officer

Data Protection Officer of City of Helsinki tietosuoja@hel.fi +358 9 310 1691 (switchboard)

This privacy notice was updated on 11 June 2024.