

## **Privacy statement**

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

Date 1 March 2025

# The processing of personal data in activities promoting participation in the City of Helsinki's Social Services, Health Care and Rescue Services Division

#### **Data controller**

Social Services, Health Care and Rescue Services Committee. The tasks of the data controller have been delegated to the Executive Director of the Social Services, Health Care and Rescue Services Division (Section 32 of the decision of the Social Services and Health Care Committee on 26 February 2019).

Contact information:

Toinen linja 4 A PO Box 6000 00099 CITY OF HELSINKI

# Why do we process your personal data and on what grounds?

The purpose of the processing of personal data is to implement opportunities for participation and influence for different resident groups. Through various participation channels and methods, comments, opinions, and development suggestions are collected on social services, health care, and rescue services matters and services that are under preparation. Feedback and participation are voluntary for municipal residents.

The processing is 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.

Personal data can also 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 processing of any special categories of personal data is based on Article 9(2)(g) of the EU General Data Protection Regulation: the processing is necessary for reasons of substantial public interest, based on Union or Member State law. In some cases, the processing may also be based on Article 9 2)(a) of the EU General Data Protection Regulation, in which case the data subject has given their explicit consent to the processing.

#### **Key legislation**

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

## What personal data do we process about you?

The personal data collected varies on a case-by-case basis. Only the necessary contact details are requested from the data subject to enable communication. In each group and event, participants are informed verbally or in writing during registration about what information will be stored about them and how it will be used. In participatory activities, the data collected generally includes identification and contact information provided by the data subject themselves. This includes name, phone number, and email address.

As a rule, special categories of personal data, such as health information, are not processed in activities promoting participation. However, information that falls under special categories, such as information about the data subject's involvement in a specific social or health service or health-related information, may be processed with the data subject's explicit consent. The participant will be separately informed about such processing.

## From where do we collect your personal data?

Personal data is collected directly from the data subject. The information is gathered in an appropriate manner, such as by asking verbally, in writing, or digitally. The collected data is stored only in secure environments specifically designed to protect personal and other sensitive information.

## To whom do we disclose or transfer your personal data?

No personal data will be disclosed. Personal data may be transferred to the service provider who processes this data on behalf of the division.

# Personal data processors

Personal data is processed only by professionals who work with the participatory activity.

The Social Services, Health Care and Rescue Services Division may outsource the implementation of participatory activities to an external service provider through a separate contract. In this case, the processing of personal data is carried out on behalf of the division and to achieve the purpose defined by the division. The division remains the data controller. Both the division and the service provider are jointly responsible for the proper processing of personal data.

## Will your personal data be transferred outside the EU or EEA?

The City of Helsinki ensures by default that personal data processing takes place within the EU or EEA area. However, in some cases, the city's services or activities may also be carried out using service providers, services, and servers located elsewhere. In such cases, personal data may be transferred outside the EU or EEA area, for example, to the United States. The General Data Protection Regulation (GDPR) sets strict criteria for the transfer of personal data to countries where the data protection laws differ from the requirements of European data protection legislation. In such cases, the City of Helsinki is committed to ensuring the adequate level of protection for personal data and will ensure that its system providers and service providers, where applicable, comply with the relevant data protection obligations as required by data protection legislation.

## How long do we retain your personal data?

The retention of personal data is based on necessity, meaning the data will be deleted when the data subject no longer participates in the participatory activity, or at the latest when the project of the participatory activity ends.

# How do we make use of the processed data?

The processed personal data can be used after the anonymisation of the material in the development work of the Social Services, Health Care and Rescue Services Division. In this case, personal data will no longer be processed, but only anonymised data that does not identify an individual participant. The results can be imported to the common storage platform of the Social Services, Health Care and Rescue Services Division, where only anonymised, analysed and aggregated data is stored.

Anonymised material may be a public document. For example, this means that the material can be processed by the City of Helsinki's Social Services, Health Care and Rescue Services Committee and published on the City of Helsinki's website and in the organisation's intranet, i.e. in the organisation's local network, which is intended for internal communication.

Data requests may be made about the completed material under the Act on the Openness of Government Activities. Individual persons cannot be identified from the completed material.

## Automated decision-making and profiling

Automated decision-making and profiling are not used to process personal data.

## Your rights regarding the processing of your personal data

The rights of the data subject 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 to review data (right of access to data, Article 15)

You have the right to know what personal data about you is being processed and what information about you has been stored. The city will provide this information without undue delay, no later than one month from the receipt of the request. The deadline may be extended by up to two months if the request is exceptionally large and complex. If the deadline is extended, the city will inform the requester within one month of receiving the request, along with the reasons for the delay.

If the city refuses to fulfil your request for inspection, it will inform you of this no later than one month from the receipt of the request. The city will also provide the reasons for the refusal, unless disclosing them would undermine the purpose of the refusal. At the same time, the city will inform you of the possibility to file a complaint with the supervisory authority and use other legal remedies.

#### Right to rectification (Article 16)

You have the right to request that the city rectify any inaccurate personal data concerning you without undue delay. You also have the right to have any incomplete information completed. Incompleteness of the data will be verified by taking into account the purpose of the processing of personal data in the register. If the city does not accept your request for rectification, it will issue a written certificate stating the reasons why the request was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned in this connection.

#### Right to be forgotten (Article 17)

You have the right to request the erasure of your data in the following cases:

- You withdraw the consent on which the processing is based, and there is no other legal basis for the processing.
- You object to the processing of your data for direct marketing.
- You object to the processing for a reason related to your personal specific situation,
   and there is no legitimate reason for the processing to continue.
- Your personal data has been processed unlawfully.
- Your personal data must be erased to comply with a legal obligation to which the controller is subject under Union or Member State law.
- Your personal data has been collected in connection with the provision of information society services, and the question is of the personal data of a minor.

If the city does not accept your request for erasure, it will issue a written certificate stating the reasons the request was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned in this connection.

The right to have data erased does not apply if the processing is necessary for compliance with the city's statutory obligation, the performance of a task carried out in the public interest or the exercise of public authority vested in the city.

#### Right to restriction of processing (Article 18)

In certain situations, a data subject 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 completed. Such situations include a data subject contesting the accuracy of their data, in which case the processing of the data will be restricted for the period it takes for the city to check the accuracy of the data.

#### Right to data portability (Article 20)

A data subject has the right to transmit their personal data from one data controller to another if they have provided the data to the data controller and the processing of the data is based on consent or a contract, and the processing is carried out by automated means. 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 official authority vested in the city.

#### Right to object (Article 21)

A data subject has the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her when the processing is based on the performance of a task carried out in the public interest or on the exercise of official authority vested in the city. In such a case, the data may no longer be processed unless the city demonstrates compelling legitimate grounds for the processing. The processing may also continue if it is necessary for the establishment, exercise or defence of legal claims.

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

A data subject has the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes the

General Data Protection Regulation ([EU] 2016/679). In addition, the data subject has the right to exercise other administrative and judicial remedies.

#### Office of the Data Protection Ombudsman

Visiting address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: PO Box 800, FI-00531 Helsinki, Finland

Email: tietosuoja@om.fi

Telephone exchange: +358 29 56 66700

## How can you contact us about privacy issues?

As a logged-in user, you can view your saved data in several city systems. You can request a correction to incorrect data in the service where that data was generated.

#### Register contact person

Communications and Participation Director, Social Services, Health Care and Rescue Services Division

Email: sotepe.osallisuus@hel.fi

#### Responsible person

Communications and Participation Director, Social Services, Health Care and Rescue Services Division

Email: sotepe.osallisuus@hel.fi

#### **Contact details**

Social Services, Health Care and Rescue Services Division
Toinen linja 4 A
PO Box 6000
00099 CITY OF HELSINKI

#### **Contact details of the Data Protection Officer**

City of Helsinki Data Protection Officer <a href="mailto:tietosuoja@hel.fi">tietosuoja@hel.fi</a>
+358 9 310 1691 (telephone exchange)

This privacy statement was updated on 1 March 2025