

## **Privacy statement**

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

# Processing of personal data in the City of Helsinki's FIT software service

#### Data controller

Social Services, Health Care and Rescue Services Committee. The tasks of the data controller have been delegated to the Head of the Social Services and Health Care Division (Section 12 of the decision of the Social Services, Health Care and Rescue Services Division on 17 January 2023).

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

Personal data is processed in order to monitor the client's well-being and any changes in the client's well-being during the service process. With the help of the indicator's answers, the service can be targeted to better meet the client's needs.

#### **Purposes of processing**

The client fills in the indicators measuring well-being and service experience at each meeting. The responses form a graph, which is reviewed together with the client, and the graph is used to monitor the progress of the client's well-being and the quality of cooperation between the client and the employee. The FIT software provides information on the effectiveness of the service for both the individual client and more broadly the development of services.

#### Legal basis for the processing personal data



Personal data is processed in order to comply with a legal obligation. The processing is permitted in accordance with Article 6(1)(c) of the EU General Data Protection Regulation.

#### **Key legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Processing of Client Data in Social Welfare and Health Care (703/2023)
- Social Welfare Act (1301/2014)
- Child Welfare Act (417/2007)
- Health Care Act (1326/2010)

#### What personal data do we process about you?

For clients, we collect their name, email address, phone number, year of birth, gender, and client's assessment of their well-being and its aspects (such as well-being in close relationships or at work/school) in the register.

For professionals, we collect the name, email address, professional title and unit in the register.

#### How do we collect personal data?

The information is obtained from the client and the professionals themselves.

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

Personal data may only be disclosed to authorised authorities on the basis of legislation or an individual request for information in accordance with legislation and the division's data protection guidelines.

#### Personal data processors

Personal data is processed by GroupNos Technologies on the basis of an agreement with



the City of Helsinki. The City of Helsinki remains the data controller of the personal data and determines the purpose and means of the processing. The City of Helsinki and the service provider are jointly responsible for the appropriate processing of your personal data.

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

Personal data is only processed within the EU or EEA.

## How long do we retain your personal data?

Personal data is stored for the duration of the service process, after which the data is anonymised. To the extent that the information is necessary to ensure the organisation, planning, implementation, monitoring and supervision of the client's social service or health care service, it is stored as patient or client data in the client information system. The retention period of patient and client data is determined in accordance with The Act on the Processing of Client Data in Social Welfare and Health Care.

## Automated decision-making and profiling

No profiling or automated decisions are made on the basis of the 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-protectionand-information-management/data-protection/rights-of-data-subjects-andexercising-these-rights

## Right to review data (right of access to data, Article 15)

You have the right to know what personal data is being processed about you and what data has been stored about you. The city will provide the data 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, they 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 be forgotten (Article 17)

In some exceptional cases – for example, if the processing of data was based on the person's consent and they withdraw 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 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 relating to their particular 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)

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

#### Office of the Data Protection Ombudsman

Visiting address: Lintulahdenkuja 4 Postal address: PO Box 800, 00531 Helsinki Email: <u>tietosuoja@om.fi</u> Switchboard: +358 29 56 66700

#### How can you contact us about privacy issues?

sotepe.fit@hel.fi

#### **Responsible person**

Chief of Centralized special services for families, sotepe.fit@hel.fi

## **Contact details**

Social services, health care and rescue services, PO Box 6000, 00099 City of Helsinki



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

City of Helsinki's Data Protection Officer tietosuoja@hel.fi +358 9 310 1691 (telephone exchange)

This privacy statement was updated on 31 July 2024

