



## **Privacy notice**

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

# **Processing of personal data in the online surveys of Helsinki Employment Services**

## **Joint controllers**

City of Helsinki / City Board

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

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

The purpose of the surveys is to collect feedback on the operations of Helsinki Employment Services. We process your personal data for the purpose of carrying out the surveys.

## **Legal basis of processing**

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;

Section 14, subsections 1–3 of the Act on Municipal Experiments to Promote Employment: client data may be used for supervision, development, monitoring, statistics, foresight and guidance related to the tasks referred to in the Act on Municipal Experiments to Promote Employment; also reference provisions of the Act on public employment and business service

Act on public employment and business service, Chapter 13, section 1(1)(4): client data may be used for supervision, development, monitoring, statistics, foresight and guidance related to the tasks referred to in the Act on public employment and business service.

### **Essential legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on Municipal Experiments to Promote Employment (1269/2020),
- Act on public employment and business service (916/2012)

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

The following data on individual clients may be collected through surveys:

- 1) name, personal identity code and contact details;
- 2) information relating to the client relationship with TE Services, using TE Services and any special arrangements required for using the services;
- 3) information on education and training, employment history and vocational skills and other data used in employment services;
- 4) information on service needs, plans and implementation of plans;
- 5) information on employment and training offers and presentations to potential employers;
- 6) information on public employment and business services and other employment promotion services and expert assessments.

## **How do we collect personal data?**

We collect personal data from you directly when you respond to survey questions. Customer experience data is combined with personal data previously collected by Helsinki Employment Services. However, personal data are anonymised before undergoing statistical analysis.

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

We do not disclose your personal data to anyone.

## **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 this case, the personal data is processed on behalf of the City and to fulfill 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 survey uses the Secure Forms service provided by Deltagon Oy.

## **Is your personal data transferred outside of the EU or EEA?**

No.

## **How long do we keep your personal data?**

We will only keep your data for as long as it takes us to analyse the results of the surveys, up to a maximum of four years.

## **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**

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-ja-tiedonhallinta/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: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Switchboard: 029 56 66700

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

If you have questions related to data protection, you can contact Helsinki Employment Services' lawyer Iiro Rosenqvist, email address [iiro.rosenqvist@hel.fi](mailto:iiro.rosenqvist@hel.fi)

### **Contact person**

City Executive Office / Economic Development / Director of Employment

In accordance with section 182 of the City Board decision on the responsibilities and tasks concerning register keeping in the City Executive Office issued on 7 March 2022, the person in charge of the register is the Director of Employment.

## Contact information

Email address: [helsinki.kirjaamo@hel.fi](mailto:helsinki.kirjaamo@hel.fi)

Postal address: PO Box 10

00099 HELSINGIN KAUPUNKI

Street address: Pohjoisesplanadi 11–13

Phone number: +358 40 310 13700

The opening hours of the Register Office are Monday to Friday 09:00–15:00.

## Contact information of Data Protection Officer

Data Protection Officer of City of Helsinki

[tietosuoja@hel.fi](mailto:tietosuoja@hel.fi)

09 310 1691 (switchboard)

This privacy notice has been updated on 21 March 2024