



The City of Helsinki's report submitted to the Office of the Data Protection Ombudsman on 8 July 2024 on the personal data stored on the breached network drive

The table below was submitted to the Data Protection Ombudsman on 8 July 2024 in response to the request for a report. The table summarises the data that was processed on the breached network drive. It is a summary of the categories of personal data stored on the network drive and which personal data was processed under these categories.

The perpetrator of the data breach gained access to only some of the data that was being processed on the breached network drive, and the table cannot be used to draw conclusions on which personal data from each category or on which specific persons the perpetrator gained access to. The investigation of the extent of the data breach continues.

Personal data content of the network drive

This table categorises the personal data stored on the breached network drive.

The following should be taken into account when interpreting the table:

- **This table cannot be used to conclude that the perpetrator of the data breach gained access to specific data on the persons of a specific person group.**
- **The table also includes document types that the network drive was used to store only individual copies of.**
 - Having a document listed in the table does not mean that a large number of those types of documents were compromised. In principle, the network drive was only used to store data that was needed in practical teaching or early childhood education operations.
- **The table only provides an estimate of the personal data that was processed on the network drive.**

Person group	Categories of personal data	Data/Document
<p>Children in the City of Helsinki's early childhood education and pre-primary education and their guardians</p>	<p>Name and contact information of children and guardians</p>	<p>Several documents contain 'basic information' about children and guardians, such as the pre-school decisions, applicant lists</p>
	<p>Daycare centre and group information</p>	<p>Information on which daycare centre and daycare centre group the children are in</p>
	<p>Health information of children</p>	<p>Information on allergies and other dietary restrictions due to health reasons (e.g. gluten-free, lactose-free)</p>
		<p>Information on conditions that affect operations (e.g. diabetes, epilepsy) and/or medication used by children</p>
		<p>Documents determining the need for support, such as special support decisions, administrative decisions on intensified or special support in early childhood education, statements on different levels</p>
	<p>Financial information of guardians</p>	<p>Account numbers and billing information for early childhood education fees</p> <p>Possibly information on level of income and family size pertaining to families having applied for a reduction of the fee</p>
<p>Personal identity codes of children and guardians</p>	<p>Decision documents</p>	

	Information on children collected in early childhood education	Drafts of texts and writings to be added to group portfolios, lists of event participants Other necessary information collected during operations, such as information collected for the processing of claims for damages
	Information produced by children	Possible examples include drawings made by children, photographs of the results of craft projects or stories written by children that were stored on the network drive
	Photographs	Photographs taken for group portfolios for which a photography permit has been obtained, other photographs subject to a photography permit
	Information on child welfare notifications or Child Welfare client relationships or documents	For example, child welfare notifications submitted due to the statutory obligations of educational institutions
	Information on religious practice	This information may be apparent based on entries about a child's diet (e.g. no pork) or other recorded preferences expressed by guardians
	Information on mother tongue and language skills	Can potentially be deduced based on whether a child is placed in a Finnish-language or Swedish-language daycare centre and which group the child has been placed in within a daycare centre
	Diet information that is not based on health or religious reasons	For example, information on whether a child follows a vegetarian or vegan diet
	Names and identifying information of alternate pick-up persons	Name and date of birth of alternate pick-up person

Person group	Categories of personal data	Data/Document
Persons of compulsory education age living in Helsinki and their guardians	Name and contact information of learners and guardians	System extract from the FACTA population database used for monitoring the realisation of compulsory education
	Personal identity codes of learners and guardians	
	Mother tongue information	
	Nationality and religious group information	

Person group	Categories of personal data	Data/Document
Pupils of the City of Helsinki's comprehensive schools and their guardians	Information collected for monitoring compulsory education and maintaining the integrity of the Primus database	See table section 'Persons of compulsory education age living in Helsinki and their guardians'
	School and class information	Information on which school and class a pupil is in. This information is contained in several documents, such as name lists, school timetables, etc.
	Subject information	Information on pupils' subjects, optional subjects and additional subjects, such as optional languages and language level (A Swedish or B Swedish)
	Health information	Special support decisions, teacher documents on health, allergy and dietary information (e.g. gluten-free diet due to coeliac disease, information on diseases affecting teaching)

		Information on any medication that pupils are on that should be taken into account in the organisation of teaching
	Information produced at the educational institution and processed for teaching purposes	Information recorded as part of teaching activities, such as school timetables, pupil lists, assessment information
	Pupils' schoolwork	Writings, presentations and other schoolwork produced by pupils as part of studies
	Photographs	School photographs, class photographs, potential other photographs taken during school trips, for which a photography permit has been obtained
	Bank account numbers	Guardians' bank account numbers may have been included in claims for damages, for example Bank account numbers collected from pupils who have been awarded scholarships for the purpose of paying the scholarships
	Information on child welfare notifications or Child Welfare client relationships or documents	For example, child welfare notifications submitted due to the statutory obligations of educational institutions and information processed for notifications
	Information on disciplinary measures in teaching	Disciplinary forms
	Information on introduction to working life periods	Information on where a pupil completed their introduction to working life period
	Mother tongue and religion information	School timetables, information on participation in instruction in these subjects

Helsinki

		<p>In place of religion, the subject may be ethics or one of the types of religious instruction (Christianity, Islam, Judaism)</p> <p>Information on mother tongue (Finnish/Swedish) or Finnish/Swedish as a second language teaching</p> <p>Information on participation in own mother tongue instruction, if available</p>
	Diet information that is not based on health reasons	For example, information on whether a pupil follows a vegetarian or vegan diet
	Information of children attending morning activities organised by schools	Children participating in morning activities (e.g. list of names)

Person group	Categories of personal data	Data/Document
General upper secondary school students and their guardians	Information collected for monitoring compulsory education and maintaining the integrity of the Primus database	<p>See table section 'Persons of compulsory education age living in Helsinki and their guardians'</p> <p>Also applies to adult students. Although their information is not collected for monitoring compulsory education, it is used to maintain the integrity of the Primus database.</p>

	School and class information	<p>Information on which general upper secondary school and class a student is in. This information is contained in several documents, such as name lists, school timetables, etc.</p> <p>Information on which general upper secondary school a student is in may reveal additional information about the student if their general upper secondary school has a special educational task (in physical education, for example). Information on which general upper secondary school and class a student is in can also be used to deduce the students' minimum average grade in primary and lower secondary education.</p>
	Health information	<p>Special support decisions, teacher documents on health, allergy and dietary information (e.g. gluten-free diet due to coeliac disease, information on diseases affecting teaching)</p> <p>Possibly information on medication used by students</p>
	Information produced at the educational institution and processed for teaching purposes	Information recorded as part of teaching activities, such as school timetables and students' course selections
	Students' schoolwork	Writings, presentations and other schoolwork produced by students as part of studies
	Device information of laptops given to students by the school	Models and IP addresses of school laptops given to students, the date on which a laptop was given to a student and whether the student has signed for the laptop

	Photographs	School photographs, class photographs, potential other photographs taken during school trips, for which a photography permit has been obtained
	Bank account numbers	Bank account numbers may have been included in claims for damages, for example Bank account numbers collected from pupils who have been awarded scholarships for the purpose of paying the scholarships
	Matriculation examination evaluation and participation information	Matriculation Examination Board's results lists
	Diet information that is not based on health reasons	For example, information on whether a student follows a vegetarian or vegan diet

Person group	Categories of personal data	Data/Document
Students of Helsinki Vocational College and their guardians	Information collected for monitoring compulsory education and maintaining the integrity of the Primus database	See table section 'Persons of compulsory education age living in Helsinki and their guardians' Also applies to adult students. Although their information is not collected for monitoring of compulsory education, it is used to maintain the Primus database
	Educational institution and study programme information	Information on the fact that a student is studying at Helsinki Vocational College and their study programme This information can be found in several documents, including lists of names, timetables

	Health information	Special support decisions, teacher documents on health and allergy information (e.g. information on diseases affecting teaching)
	Photographs	School photographs, class photographs, potential other photographs taken during school trips, for which a photography permit has been obtained
	News information	<p>Texts included in news and personal interviews concerning students published on Helsinki Vocational College's website¹</p> <p>Typically, these include the student's name and detail their experiences of studying at Helsinki Vocational College</p>
	Information produced at the educational institution and processed for teaching purposes	Information recorded as part of teaching activities, such as digital schoolwork, timetables and students' course selections
	Students' schoolwork	<p>Writings, presentations and other schoolwork produced by students as part of studies</p> <p>At Helsinki Vocational College, schoolwork can also include physical objects (metalwork, woodwork), websites or services (e.g. a hairdressing student's portfolio). Information on these types of schoolwork may also be stored on network drives.</p>
	Bank account numbers	<p>Bank account numbers may have been included in claims for damages, for example</p> <p>Bank account numbers collected from pupils who have been awarded scholarships for the purpose of paying the scholarships</p>

¹ For example: <https://stadinao.fi/sarah-ja-ella-ovat-tuoreita-hiusalan-ammattilaisia/>

	Diet information that is not based on health reasons	For example, information on whether a student follows a vegetarian or vegan diet
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Person group	Categories of personal data	Data/Document
Private school students and their guardians	Information collected for monitoring compulsory education and maintaining the integrity of the Primus database	See table section 'Persons of compulsory education age living in Helsinki and their guardians'
	School application information	Information on whether a pupil has applied to a specific City of Helsinki school or a specific study programme at a City of Helsinki school via the joint application system

Person group	Categories of personal data	Data/Document
Children participating in after-school activities and their guardians	Health information	Special support decisions, teacher documents on health and allergy information (e.g. information on diseases affecting teaching)
	Diet information that is not based on health reasons	For example, information on whether a pupil follows a vegetarian or vegan diet
	Application information concerning after-school activities	Information on a place in after-school activities applied for, information on siblings, contact details
	Client fee payment information and health information affecting client fees	Account number, payment information Information processed for the purpose of determining the fee, which may include information on

		<p>guardians' income level or a child's special care programme²</p> <p>If a pupil is absent from after-school activities due to illness for 11 days, the client fee is not charged – this may be deduced from the payment information</p>
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Person group	Categories of personal data	Data/Document
Children participating in playground activities and their guardians	1st–2nd grade pupils and/or special support pupils in higher grades participating in the after-school activities of playgrounds subject to a fee	See table section ‘Children participating in after-school activities and their guardians’
	Application information concerning playground activities and information on places applied for	As a general rule, it is possible to participate in playground activities without advance registration. However, some playground activities are subject to an application:
	Name and contact information of guardians and children	Applications for playground club activities include the following information: name, home address and home phone number of a child and their guardian(s), telephone numbers and email addresses of guardian(s), personal identity codes of a child and their guardian(s), place and start date of the club activities applied for, language skills (Finnish/Swedish) and the application itself
	Personal identity codes of guardians and children	
	Mother tongue and language skills (Finnish/Swedish)	Playgrounds’ infant family guidance activities may include advance registration, which involves collecting the names and contact information of participants

² <https://www.hel.fi/en/childhood-and-education/basic-education/morning-and-after-school-activities-clubs-and-hobbies/after-school-activities/fees-for-after-school-activities>

Person group	Categories of personal data	Data/Document
Children in private early childhood education and their guardians	Information collected for the payment of separate compensation to service providers	Information on children's siblings for the payment of sibling compensation Date and year of birth for payment of 5-year-old compensation Children's support decisions for the payment of compensation for support

Person group	Categories of personal data	Data/Document
Private early childhood education workers (are not City of Helsinki employees, but data on them are collected because the City pays compensation to private early childhood education institutions)	Qualification documents	Diploma
	Workplace information	Information on the worker's workplace/employer

Person group	Categories of personal data	Data/Document
Swedish Adult Education Centre Arbis' SFI integration students	Name and contact information	This information is stored on a network drive because the information of SFI integration students cannot be processed in the Kursor system due to technical limitations
	Timetable information	
	Course information	

Person group	Categories of personal data	Data/Document
Adult students (general upper secondary school for adults, vocational education and training)	Health information	Special support decisions, teacher documents on health and allergy information (e.g. information on diseases affecting teaching)
	Name and contact information	Full name, address information, email/phone number in the system
	Personal identity codes	Students' personal identity codes in systems and decisions
	Mother tongue and language skills	Can potentially be deduced based on the language of instruction of the general upper secondary school for adults (Finnish/Swedish)
	Information produced at the educational institution and processed for teaching purposes	Information recorded as part of teaching activities, such as digital schoolwork, timetables, students' course selections, which level of adult education the person is participating in (primary and lower secondary education/general upper secondary education)

Person group	Categories of personal data	Data/Document
Apprenticeship students	Basic information of students who are minors collected for the purpose of supervising compulsory education	See table section 'Persons of compulsory education age living in Helsinki and their guardians'
	Information on apprenticeships	Information on where apprenticeship students are completing their apprenticeships, information on the contact persons of apprenticeships

		Names and contact information are collected from the contact persons of apprenticeships
	Name and contact information	Apprenticeship admission decision
	Personal identity codes	Apprenticeship admission decisions, apprentice students' monitoring lists
	Information on social benefits for students	Information on potential daily allowance or family allowance, information on the amount to be paid
	Information on previous degrees and qualifications	Apprenticeship admission decision

Person group	Categories of personal data	Data/Document
Employed caregivers (are not City of Helsinki employees), the children under their care and their guardians – collected to ensure the private day care allowance paid by the City³	Information on families employing caregivers	Names and contact information of the children and families
		Personal identity codes of children
	Employment and background information of employed caregivers	Caregivers' employment contracts and bank information
		Job applications and qualifications and degrees

³ Further information: <https://www.hel.fi/en/childhood-and-education/varhaiskasvatus/tuki-lapsen-hoitamiseen-kotona>

Person group	Categories of personal data	Data/Document
People who have submitted applications for support for multiple-birth families and adopted children⁴	Family contact information and names	Names of family members and family contact and address information
	Personal identity codes	Information on applicants and the children relevant to applications
	Payment information	Applicants' account numbers and bank information for the payment of support
	Information on the fulfilment of eligibility requirements for support	<p>The amount of the Helsinki supplement for adopted children is EUR 264 per month, which is paid for a period of one year from the start of the parental allowance period for an adopted child over one year of age living in Helsinki who is receiving home care allowance.</p> <p>The benefit for multiple-birth families is available to families where more than one child has been born or adopted simultaneously</p>

Person group	Categories of personal data	Data/Document
Persons who have submitted data subject access requests from 2022 onwards	Name and contact information (address or email)	Data subject access requests submitted to the Education Division by data subjects or relayed to the Education Division
	Personal identity codes	
	Health information	Sometimes data subject access requests also include background information, such as "I am requesting information for ADHD examinations", in which case the request also contains health information

⁴ <https://www.hel.fi/fi/kasvatus-ja-koulutus/varhaiskasvatus/tuet-lapsen-hoitamiseen-kotona>

	<p>Responses to data subject access requests</p>	<p>Sometimes the response is a statement saying that there is no data. In this case, the only personal data is the statement itself.</p> <p>In other cases, the amount of data provided is high. The documents most typically provided in response are:</p> <ul style="list-style-type: none"> - school certificates - student welfare documents - early childhood education reports. <p>Such documents are stored as attachments to the provided responses</p>
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Person group	Categories of personal data	Data/Document
<p>Persons who have submitted claims for damages and appellants</p>	<p>Name and contact information</p>	<p>The V drive was used to store individual claims for damages, which included names and contact information, incident information and bank account information.</p>
	<p>Incident information</p>	
	<p>Health information</p>	<p>The claims have typically concerned the missing or broken possessions of children.</p>
	<p>Bank account information</p>	<p>Incident information may include health information relevant to incidents (e.g. injuries)</p>
	<p>Appellant information</p>	<p>The network drive may have been used to store documents related to claims for administrative reviews and appeals concerning appealable decisions. In such cases, data include the name and contact information of the appellant, the decision being appealed against and the grounds for the appeal</p>

Person group	Categories of personal data	Data/Document
<p>Persons who have applied to educational institutions</p>	<p>Entrance exam and application information of general upper secondary schools with a special educational task</p>	<p>General upper secondary schools with a special educational task have different application criteria and collect different information as part of their application processes.</p> <p>Example: Kallio Upper Secondary School of Performing Arts⁵:</p> <ul style="list-style-type: none"> - application form (also includes statements by two teachers) - summary of leisure activities form - ctivity-specific forms and potential appendices, and - free-form application. <p>Example: Mäkelänrinne Upper Secondary School (physical education)⁶:</p> <p>The purpose of the educational institution's scoring is to support sports associations' scoring to ensure the admission of the most potential athletes. Factors that may be taken into account in the educational institution's scoring include:</p> <ul style="list-style-type: none"> - tripartition of sports: school priority sports, sports included in the school's range of sports, other sports - training and/or coaching conditions of the sport - applicant's motivation to study - athletic potential - any tests and interview used by the school - other possible matters <p>Example: Helsinki Upper Secondary School of Visual Arts⁷:</p> <ul style="list-style-type: none"> - preliminary exercise, entrance exam

⁵ <https://www.hel.fi/fi/kasvatus-ja-koulutus/kallion-lukio/tutustu-ja-hae/nain-haet> (page in Finnish)

⁶ <https://www.hel.fi/fi/kasvatus-ja-koulutus/makelanrinteen-lukio/tutustu-ja-hae/hae-urheilulukioon> (page in Finnish)

⁷ <https://hktl-torkkeli.wixsite.com/hakuopas24> (in Finnish)