



## **Privacy Policy**

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

## **Processing of personal data in the City of Helsinki's accounting system**

### **Controller**

City of Helsinki / City Board

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

The processing of personal data is associated with the city's accounting, invoicing and ledger management.

The purpose of the personal data processing is to carry out the City of Helsinki's external and internal accounting and fixed asset management as well as manage invoicing, sales and purchase accounts.

### **Legal grounds for the processing of personal data**

In accordance with Article 6(1)(e) of the EU General Data Protection Regulation, the 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.

### **Essential legislation**

- Accounting Act (1336/1997)

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

System user data is obtained via an integration from a centralised user management system. User rights are granted based on an application from the supervisor. Dangerous work combinations are assessed in association with the granting of user rights.

With regards to invoicing, the data subject's identity and contact information and bank contact information are:

- The person's first and last name
- Personal identity code
- Address
- Online invoicing information
- Bank account
- In addition, a client invoice may mention the names of minor dependants, among others.
- Information on the validity period of the prepayment register and the entrepreneurs' pension insurance and information on liquidation or bankruptcy.
- Information associated with being a client of and using the services of early childhood education and social and health services.

## **Where do we get your personal data from?**

The data are obtained from the data subject themselves and from the Population Information System. Basic information on the client (name, personal identity code, address) is automatically imported obtained from the system by Finland's Digital and Population Data Services Agency. System user data is obtained from the city's centralised management system (AD).

## **With whom do we share your personal data?**

Personal data may be disclosed within the framework of what is permitted and required by law to authorities such as the police and other parties specified by law, for example, to a debt collection agency for the purpose of collecting fees.

## **Processors of personal data**

The processors of personal data in the accounting register are either the suppliers of the individual technology systems or the City of Helsinki's contracted service providers.

The city may outsource the processing of your personal data to an external system supplier or service provider under a separate service contract. In such cases, the processing of personal data takes place on behalf of and for the benefit of the city, to fulfil a purpose determined by the city. The City of Helsinki remains the data controller for your personal data. The city and the service provider are jointly responsible for the correct processing of your personal data.

Central data processors:

- CGI Suomi Oy
- s4access
- Atos IT Solutions and Services Oy
- SAP

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

The City of Helsinki ensures by default that your personal data is processed within the EU or EEA. However, in some cases, the city's services or operations may also be implemented using service providers, services and servers located elsewhere. In exceptional circumstances, your personal data may be transferred outside the EU or EEA to the United States. In this case, the personal data transfer mechanism complies with the EU-US data protection framework that Microsoft has committed to using.

The General Data Protection Regulation sets strict criteria for the transfer of personal data to countries whose legislation on the processing of personal data deviates from the requirements of European data protection legislation. In such cases, the City of Helsinki undertakes to comply with the requirements for an adequate level of protection for personal data, and, where applicable, obliges the system suppliers and service providers it uses to comply with the corresponding data protection obligations in the manner required by data protection legislation.

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

Data in the register will be stored for ten (10) years, in line with standard storage period for invoices.

## **Automated decision-making and profiling**

We do not use automated decision-making and profiling.

## **Your rights with regard to the processing of your personal data**

The rights of the data subject and instructions for exercising 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 access data (right of access by the data subject, Article 15)**

You have the right to know what personal data about you is being processed and stored. 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 deadline is extended, the city will notify the person requesting the information of this within one month of receiving the request and state the reasons for the delay.

If the city does not agree to the request, it will notify the data subject of this no later than one month after receipt of the request. The city will also state the reasons for the refusal unless it compromises the purpose of the refusal. You will also be notified in this context about the possibility of lodging a complaint with a supervisory authority and seeking other legal remedies.

## **Right to rectification of data (Article 16)**

You have the right to request that the city rectifies inaccurate or incorrect personal data about you without undue delay. In addition, you have the right to have incomplete data on you completed. Whether the data is incomplete or not is determined by taking into account the purposes of the processing of the personal data in the register.

If the city does not approve your request for rectification of data, it will issue a written certificate which states the reasons for the refusal of the request. You will also be informed at this time of the possibility of lodging a complaint with a supervisory authority and seeking other legal remedies.

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

In certain situations, you may have the right to request that the processing of your personal data be restricted for a period of time, until your data has been reviewed or corrected or completed in an appropriate manner. Such a situation could be, for example, if you dispute the accuracy of your data, in which case the processing of your data will be suspended until the city verifies its accuracy.

### **Right to object (Article 21)**

You have the right, on grounds relating to your specific personal situation, to object at any time to the processing of your personal data, if the processing is based on legitimate interest, the performance of a task carried out in the public interest or in the exercise of official authority vested in the city. In this case, the processing of the data may continue only if the city can demonstrate compelling and 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 a supervisory authority (Article 77)**

You have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data infringes the EU General Data Protection Regulation (EU) 2016/679. You also have the right to exercise other methods of administrative appeal and legal remedies.

#### [Office of the Data Protection Ombudsman](#)

Street address: Lintulahdenkuja 4

Postal address: PO Box 800, 00531 Helsinki

Email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Telephone exchange: +358 29 56 66700

### **Whom can I contact if I have questions about data protection?**

To rectify incorrect information, please contact the service from which the data originated.

**Contact person:**

Financial Management Services municipal enterprise

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

**Person in charge of the register**

According to a decision by the City Board (7 March 2022 § 182) on the responsibilities and duties related to registers in the City Executive Office, the person in charge of the register is the budget manager appointed by the finance director.

**Contact information**

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

**Contact information of the data protection officer**

City of Helsinki's Data Protection Officer

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

+358 9 310 1691 (telephone exchange)

This Privacy Policy has been updated on 6 March 2026.