



Privacy notice

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

Processing of personal data in the City Executive Office's digital participation services

Controller

City of Helsinki / City Board

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 Communications Director.

Why do we process your personal data and on what legal basis?

The purpose of processing personal data is to facilitate participation and influencing opportunities for the municipality's residents and City employees. Participation is voluntary for residents. The digital participation channels are used to collect comments, opinions and development suggestions from city residents and City employees regarding services and matters under preparation. Participants respond to surveys or they can participate in co-creation through various digital participation platforms.

With regard to the City's participation services for residents, the legal basis for processing personal data is 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.

Users may log in to the Kerrokantasi service. With regard to logging in to the Kerrokantasi services and processing special categories of personal data, such as health data, the legal basis for processing personal data is Article 6(1)(a) of the EU General Data Protection

Regulation: the data subject has given consent to the processing of his or her personal data.

As a general rule, special categories of personal data are not processed in the digital participation services. If special categories of personal data are processed, the legal basis for the processing is Article 6(1)(a) of the EU General Data Protection Regulation: the data subject has given consent to the processing of his or her personal data.

With regard to employee participation and influencing services, the legal basis for processing personal data is 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.

Which personal data do we process?

Depending on the service, the personal data processed may include the name, title, email address, telephone number, address and organisation of the data subject. Special categories of personal data processed may include health-related or other sensitive information provided in surveys, for example.

Surveys can also be targeted, in which case a person is invited by email to respond to the survey via a personalised link. In targeted surveys, information concerning the respondent is not linked to their survey responses, but is only used to track the number of responses received. In targeted surveys, the respondent is informed that their responses will not be linked to data concerning the respondent.

From where do we collect your personal data?

Personal data are collected from data subjects themselves when they submit their contact information or log in to the service, provided that the service allows for this.

In targeted surveys, data concerning the recipient are imported from the Helsinki Population Information System or another system maintained by the City.

In the Kerrokantasi service, users can choose to log in to the service by using their Helsinki profile.

Data concerning City employees can be imported into the service through the SSO login maintained by the City's access rights management.

To whom do we transfer or disclose your personal data?

The data are disclosed to requesting parties in accordance with the Act on the Openness of Government Activities. The data and documents are public unless they are expressly provided by law to be kept secret.

The City may outsource the processing of your personal data to an external system supplier or service provider based on a separate agreement. Personal data are processed by the following service providers.

Surveys and discussions for city residents and City employees:

- Microsoft, Webropol, DigiFinland Oy (Voxit service)

Kerrokantasi

- Microsoft (Azure)

Are your personal data transferred outside of the EU or EEA?

As a general rule, no personal data are transferred outside the EU or EEA. Data transfers to the United States are possible. Transfers are based on an adequacy decision, as referred to in Article 45.

How long do we retain your personal data?

Personal data are retained for five years, after which they are deleted or anonymised.

Automated decision-making and profiling

The personal data are not used for individual automated decisions or profiling purposes.

Rights concerning the processing of your personal data

The rights of data subjects 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 of access (Article 15)

You have the right to obtain confirmation as to what personal data concerning you are being processed and what data concerning you have been 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 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.

If the City refuses to fulfil your access request, it will inform you of this within one month of receiving the request. The City will also provide the reasons for the refusal, unless doing so would compromise the purpose of the refusal. You will also be informed of the possibility of lodging a complaint with the supervisory authority and of judicial remedies.

Right to rectification (Article 16)

You have the right to demand that the City rectify inaccurate and incorrect personal data concerning you without undue delay. You also have the right to have incomplete data completed. Whether the data are incomplete will be determined based on the purpose of the processing of the personal data.

If the City does not accept your demand for rectification, it will issue a written certificate stating the reasons why the demand was not accepted. You will also be informed of the possibility of lodging a complaint with the supervisory authority and of judicial remedies.

Right to erasure, right to be forgotten (Article 17)

You have the right to request the erasure of personal data concerning you in the following cases:

- You withdraw your consent on which the processing was based and there is no other legal basis for the processing.
- You object to the processing of the personal data for purposes of direct marketing.

- You object to the processing on grounds relating to your particular situation and there are no overriding legitimate grounds for the processing.
- The personal data have been unlawfully processed.
- The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services and concern a minor.

If the City does not accept your request for erasure, it will issue a written certificate stating the reasons why the request was not accepted. You will also be informed of the possibility of lodging a complaint with the supervisory authority and of judicial remedies.

The right to erasure does not apply to processing that is necessary for the fulfilment of the City's legal obligation, the performance of a task carried out in the public interest or in the exercise of official authority vested in the City.

Right to restriction of processing (Article 18)

In certain situations, you may have the right to request that the processing of personal data concerning you is restricted until the data have been duly checked and corrected or completed. Such situations include you contesting the accuracy of the personal data, in which case processing will be restricted for the period it takes the City to verify the accuracy of the data.

Right to object (Article 21)

You have the right, based on your particular personal situation, to object at any time to the processing of personal data concerning you when the processing is based on legitimate interests, the performance of a task carried out in the public interest or the exercise of official authority vested in the City. In this case, the data may continue to be processed only if there is a substantial and justified reason for the processing that the City is able to demonstrate. The processing may also continue if the processing is necessary for the establishment, exercise or defence of legal claims.

Right to withdraw consent (Article 7)

If the legal basis for processing personal data concerning you is your consent, you have the right to withdraw your consent at any time. The City will inform you of this right when requesting your consent.

The withdrawal of consent does not affect the lawfulness of processing done prior to the withdrawal of consent.

Right to lodge a complaint with a supervisory authority (Article 77)

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

[Office of the Data Protection Ombudsman](#)

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

Contact person

City Executive Office / Communications Department / Development Manager,
neuvonta@hel.fi

Person in charge

City Executive Office / Communications Department / Communications Director

Contact details

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

Contact details of the Data Protection Officer

Data Protection Officer of the City of Helsinki

tietosuoja@hel.fi

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This privacy notice was updated on 18 December 2025.