

#### **Privacy notice**

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

# Processing of personal data in the City of Helsinki's recruitment processes

## Controller

City of Helsinki / City Board

# Person in charge of the register

City Executive Office / Human Resources / Head of the Availability of Personnel and Employer Image Unit

# Why do we process your personal data?

We process personal data for the purpose of filling the City's vacancies, offering work to City employees subject to reassignment, sending alerts about new vacancies that applicants have expressed interest in using the saved search function and sending a survey on the applicant experience to people who have applied for a job at the City of Helsinki in order to develop the recruitment process.

#### Legal basis of processing

The legal basis of processing personal data is Article 6(1)(b) of the EU General Data Protection Regulation: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

The legal basis of processing personal data is 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.

#### **Essential legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Protection of Privacy in Working Life (759/2004)
- Act on Civil Servants in Local Government (304/2003), Section 4
- Employment Contracts Act (55/2001)
- Act on Equality between Women and Men (609/1986)
- Local Government Act (410/2015)
- Act on the Openness of Government Activities (621/1999)
- Archives Act (831/1994)
- Administrative Procedure Act (434/2003)
- Non-discrimination Act (1325/2014)
- Act on Information Management in Public Administration (906/2019)
- Security Clearance Act (726/2014)

# Which personal data do we process?

We process the following personal data on job applicants and City employees subject to reassignment: identifying and contact information; information on education, language skills, work experience and competence; applicants' video interviews and free-form presentations; and applicants' saved search settings pertaining to what kinds of jobs they are interested in.

To the data collected in the register will be added categorisations relevant for the recruitment process (such as meeting the qualifications criteria and information about the stages of the recruitment process) and evaluations.

Furthermore, the process of recruiting supervisors and managers utilises recruitment methods such as personal evaluation, operating style charting or reference requests, the purpose of which is to chart matters such as assessments of the applicant's competence, operating methods or previous work experience. This information is processed by people

who participate in the recruitment process. The contact details of references provided by the applicant are retained throughout the recruitment process and for an additional two years in the recruitment system.

For public service recruitments, selection decisions—including the name of the selected candidate, any reserve candidates, and assessments of top applicants—are published on the public internet. The name and assessment of the selected candidate remain visible online even after the appeal period has ended. All other personal data are removed from public view at that point.

We have determined positions that require a particularly high level of security. Persons proposed for these positions are subject to security clearance vetting by the Finnish Security and Intelligence Service (Supo) in connection with the recruitment process. Security clearance vetting is only conducted with the subject's written consent.

# How do we collect personal data?

The data is collected from the data subject themselves or their referees in connection with the recruitment or reassignment process. Clearance vetting information is provided by the Finnish Security and Intelligence Service (Supo).

# To whom do we disclose your personal data?

Data is only disclosed from the customer register of recruitment in the situations referred to in the legislation (Section 11 of the Act on the Openness of Government Activities).

Pursuant to the publicity principle of official documents, the documents of the City of Helsinki are public unless ruled otherwise by the legislation (Section 1 of the Act on Openness of Government Activities). As the City of Helsinki is an authority of public administration, the data in the customer register of recruitment is chiefly public, unless the data has been ruled confidential due to privacy protection or other justified reason. According to the publicity principle, the data is principally only available upon request.

Confidential data is processed in a confidential manner and it is not disclosed to outside parties. However, much of the data in the register is confidential and it cannot be accessed even upon request.

The data accessible by the party is only disclosed from the register of recruitment in the situations referred to in the legislation (Section 11 of the Act on the Openness of Government Activities). Under Section 24 of the Act on the Openness of Government Activities, the following data saved in the register of recruitment and the documents containing the data are confidential.

- Data about psychological tests, aptitude assessments or their results, or assessments
  performed in relation to employee selection or wages (personal assessments and work
  method assessments) (Paragraph 29 of Section 24 of the Act on the Openness of
  Government Activities).
- Data about unlisted phone numbers or contact details covered by non-disclosure for personal safety reasons (municipality of residence, address, phone number)
   (Paragraph 31 of Section 24 of the Act on the Openness of Government Activities).
- Data about the opinions the person has expressed in their private life, data about the
  person's lifestyle, participation in union activities, free-time hobbies, family life or other
  comparable personal aspects (family relations, hobbies, political conviction)
   (Paragraph 32 of Section 24 of Act on the Openness of Government Activities).

## **Processors of personal data**

In some cases, the City outsources the processing of your personal data to an external system supplier or service provider based on a separate agreement. In such a case, the personal data is processed on behalf of the City and to fulfil 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 following service providers/system suppliers process personal data in the City of Helsinki's recruitment processes:

- Grade Solutions Oy Maintenance and development of the recruitment system, as well as applicant experience surveys
- RecRight Oy maintenance and development of the video interview tool
- Talogy (Finland) Oy charting of supervisors' operating style
- Talentwise Oy digitalreference processing

- Momentous Oy personal evaluations and services supporting recruitment
- MPS Career Oy personal evaluations and services supporting recruitment
- Group Bravedo Oy personal evaluations and services supporting recruitment
- Eezy Personnel Oy personal evaluations and services supporting recruitment
- Iro Research Oy applicant experience survey

#### **Data protection principles**

The parties processing the personal data in the register of recruitment are bound by obligation of secrecy. Some of the data is confidential in which case it is processed with particular carefulness and the access rights are limited to a certain processor group and they cannot be disclosed even upon request.

Access rights to the personal data systems and files are based on personal access rights whose use is controlled. Access rights are granted position-specifically and they are removed when the person leaves the position for which the rights have been granted. The personnel are introduced to data protection and appropriate processing of personal data. Data is also protected through technical measures, such as information security procedures within IT systems, data anonymisation, and actions taken to ensure the continuity of system operations.

# How long do we retain your personal data?

Applications and video interview responses are retained for two years after the position has been filled. Open applications are retained for two years or for the duration specified by the applicant. The retention period defined by the applicant must be at least one day and no more than two years.

Other reports produced by support measures potentially used to support the selection process (e.g. personal evaluations, reference reports) are retained by the City for the duration of the processing of the recruitment process, after which the reports are destroyed. The City has agreed on a two-year retention period with its service providers. The written notification of the security clearance provided by the Finnish Security Intelligence Service (SUPO) is destroyed immediately once it is no longer needed for the purpose specified when the clearance was requested, and no later than six months after the information has been received.

Data covered by the City's obligation to offer work is retained for as long as the person is covered by the obligation to offer work.

# Automated decision-making and profiling

Your personal data will not be used for automated decisions or profiling purposes.

# 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/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 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

The City of Helsinki has a legitimate interest and legal right to retain recruitment-related data, and therefore applications are not deleted before the end of the designated retention

period. Applications are stored for two years. This two-year retention period is based, among other things, on the right to bring a claim under the Equality Act. A claim for compensation must be filed within two years of a violation of the prohibition of discrimination, and the data are retained for two years to meet the burden of proof as set out in Section 9a of the aforementioned Act.

#### 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

Switchboard: 029 56 66700

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

rekrytointipalvelut@hel.fi

#### **Contact person**

The contact person for the register is the Development Manager of the Recruitment Services team

#### **Contact information**

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

#### **Contact information of Data Protection Officer**

Data Protection Officer of City of Helsinki

tietosuoja@hel.fi

+358 9 310 1691 (switchboard)

This privacy notice was updated on 20 October 2025.