



## **Privacy notice**

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

# **Processing of personal data in the City of Helsinki's feedback service**

## **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. The City's feedback channel enables the municipality's residents to report problems and submit feedback on the City's operations.

With regard to the feedback service, 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?**

The feedback service primarily collects identifying and contact information provided by the data subjects themselves. These include the person's name, email address and phone

number. Submitted feedback may also contain other personal data provided by the feedback provider. The server also collects users' IP addresses in case any misuse needs to be investigated. Users can also use strong identification to log in to the feedback service, whereby the service records the person's name, email address and personal identity code.

Data subjects are not requested to provide special categories of personal data, but if a data subject provides such data, they are processed as stipulated in Article 9 of the EU General Data Protection Regulation.

### **From where do we collect your personal data?**

Personal data are collected from data subjects themselves when they submit feedback or log in to the service. The data collected in the voluntary strong identification process is obtained via the Suomi.fi service. A data subject may also provide their information to the feedback service via a third-party application through an API.

Data concerning the City employee who processes submitted feedback are imported into the service via SSO login with an AD account.

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

The data are disclosed for the purposes of development or knowledge management, where direct identifying information is removed automatically. The data are disclosed to requesting parties in accordance with the Act on the Openness of Government Activities. The data and documents, such as submitted feedback, 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.

The system supplier processing the personal data:

- Twoday Oy

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

The personal data are not transferred outside the EU or EEA.

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

Personal data are retained for five years, after which they are deleted and anonymised. Machine-anonymised feedback is retained for 50 years for development and research purposes.

## **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 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 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](#)

Visiting address: Lintulahdenkuja 4

Postal address: PL 800, 00531 Helsinki

Email: tietosuoja@om.fi

Switchboard: +358 29 566 6700

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

### **Contact person**

City Executive Office / Communications Department / Development Manager,  
palautetuki@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

+358 9 310 1691 (switchboard)

This privacy notice was updated on 18 December 2025.