



## **Privacy notice**

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

# **Processing of personal data in the digital support services of the Helsinki City Executive Office**

## **Controller**

City of Helsinki / City Board

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

The purpose of the processing of personal data is to provide Helsinki residents with support for the use of digital services. The digital support services of the City Executive Office offer face-to-face advice, as well as support via phone and chat. The customer can also book an appointment with the digital support services. Additionally, the digital support services collect and process customer feedback.

Digital support, appointment booking and processing of customer feedback

- 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.

In situations where a customer of the digital support services signs into a system for which they need support, the customer is asked for their consent to the processing of any data that may be visible in the system.

- Article 6(1)(a) of the EU General Data Protection Regulation: the data subject has consented to the processing of their personal data for one or more specific purposes.

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

Digital support:

- Information provided by the customer on the guidance topic, for instance

Appointment booking for digital support:

- Name
- Phone number
- Email address
- Possible guidance topic

Customer experience system of the digital support services (online form):

- As a general rule, the customer feedback system TUNTU does not collect personal data. The personal data that is processed is information provided by the feedback provider.

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

The data is obtained from the individuals themselves in connection with requests for support or appointment booking.

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

Appointment booking for digital support

- Microsoft

Feedback service of the digital support services (online form)

- Roidu

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

As a general rule, no personal data is 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 keep your personal data?**

- The data recorded in the appointment booking system is retained for 180 days.
- Chat logs and call recordings are retained for six months.
- Feedback is retained for five years. If the feedback includes personal data, the personal data is deleted every six months.

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

No automated decision-making or profiling is carried out in the service.

## **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 what personal data is processed about you and what data is stored about you. 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 carry out your request for access, it will inform you of this within one month of receiving the request. The city will also state the reasons for the refusal, unless this would jeopardize 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 imprecise and inaccurate personal data concerning you without undue delay. In addition, you have the right to supplement incomplete information. Any incompleteness of the data will be resolved by taking into account the purpose of the processing of personal data.

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**

This applies to digital support provided when a customer signs in to a system for which they need support.

You have the right to request the erasure of your data in the following cases:

- You withdraw your consent on which the processing was based on and there is no other legal basis for the processing.
- You object to the processing of your 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.
- Your personal data has been unlawfully processed.
- Your personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- Your personal data has been collected in relation to the offer of information society services and it concerns the personal data of 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. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies is also mentioned in connection with the certificate.

The right to erasure does not exist if the processing is based on compliance with the city's statutory obligation, or it is related to the performance of a task carried out in public interest or the exercise of public 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 your personal data is restricted until your data has been duly checked and corrected or supplemented. Such situations include when you deny accuracy of your data, in which case the processing of your data is restricted for the time the city checks its accuracy.

### **Right to data portability, Article 20**

This applies to digital support provided when a customer signs in to a system for which they need support.

You have the right to transfer your personal data from one controller to another if you have provided the controller with your personal data by yourself, 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**

This does not apply to digital support provided when a customer signs in to a system for which they need support.

You have the right to object at any time on grounds relating to your personal situation to the processing of your 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 defense of legal claims.

### **Right to withdraw consent, Article 7**

This applies to digital support provided when a customer signs in to a system for which they need support.

When the processing of your personal data is based on consent, you have the right to withdraw your consent at any time. When the city asks you to give the city your consent, you are informed of this right at the same time. The withdrawal of consent does not affect the lawfulness of processing done prior to the withdrawal of consent.

### **Right to lodge a complaint with an authority, Article 77**

You have the right to lodge a complaint with the supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the EU General Data Protection Regulation. In Finland, this supervisory authority is the Data Protection Ombudsman. In addition, 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 / Digital Inclusion / Planning Officer,  
[digituki@hel.fi](mailto:digituki@hel.fi)

### **The person responsible for the service**

City Executive Office / Communications Department / Chief Communications Officer

### **Contact information**

City of Helsinki, *Registrar's Office, PL 10 (Pohjoisesplanadi 11-13), 00099 Helsingin kaupunki*

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

Data Protection Officer of City of Helsinki

tietosuoja@hel.fi

+358 9 310 1691 (switchboard)

This privacy notice has been updated on 21 March 2025.