



Privacy Policy

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

Processing of personal data in the City of Helsinki's feedback service and digital participation services

Data controller

City of Helsinki/City Board

Person in charge of the register

City Executive Office/Communications Department/Communications Director

Why do we process your personal data?

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 municipality residents to submit fault reports and feedback on the City's activities. The digital participation channels are used to collect comments, opinions and development suggestions from municipality residents and City employees regarding services and matters under preparation.

Legal basis of processing

In connection with the feedback service and resident participation services, the legal basis used 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.

In connection with the Voice Your Opinion service (KerroKantasi), the legal basis used is Article 6(1)(a) of the EU General Data Protection Regulation: the data subject has given consent to the processing. Participation is voluntary for residents. Users may log in to the service.

In connection with employee participation and engagement services, the legal basis used 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.

Key legislation

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Act on the Openness of Government Activities (621/1999)

Which personal data do we process?

The personal data collected varies by participation channel. Each participation and feedback service features a section explaining which personal data is collected in the service.

The feedback and participation services primarily collect individualisation and contact details provided by the data subject themselves. These include the person's name, email address and phone number. The server also collects users' IP addresses in case any misuse needs to be investigated.

The user can also use strong authentication when logging in to the feedback service, whereby the service records the person's name, email address and personal identity code.

When a user logs in to the KerroKantasi service by using their Helsinki profile, their name, email address and individual identifier are recorded.

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

How do we collect personal data?

Personal data is collected from data subjects themselves when they submit feedback or log in to the service, provided that the service in question facilitates this.

A data subject may also provide their information to the feedback service via a third-party application through an interface connection.

Users can choose to log in to the KerroKantasi service by using their Helsinki profile.

The data collected in the voluntary strong authentication process used in the feedback service is obtained via the Suomi.fi service.

If a user wants to log in to the service as a City employee, they can do so with the City's AD credentials.

To whom do we disclose personal data?

No personal data is disclosed to third parties.

Processors of personal data

In the City's digital participation services, the party processing personal data is the technical supplier of each service or the City of Helsinki's contract suppliers.

The City may outsource the processing of your personal data to an external system supplier or service provider based on a separate agreement. In that 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.

Is personal data transferred outside the EU or EEA?

No personal data processed in the feedback service is transferred outside the EU or the EEA.

Personal data collected in the digital participation services may be transferred outside the EU or the EEA.

By default, the City of Helsinki ensures that your personal data is processed within the EU or the EEA. However, in some cases, the City's services or functions may also be implemented by a service provider located somewhere else, by using services and servers. In such case, your personal data may be transferred outside the EU or the EEA. The General Data Protection Regulation sets strict criteria for transferring data to countries whose legislation concerning the processing of personal data deviates from the requirements of European data protection legislation. In such cases, the City of Helsinki commits to adhering to the requirements set for an adequate level of personal data protection and, where applicable, commits its system suppliers and service providers to take care of similar data protection obligations, as prescribed in data protection legislation.

How long do we retain personal data?

Residents' feedback and personal data are retained for five years, after which they are removed and anonymised.

Personal data collected through the City's other participation channels is retained for five years.

How do we protect personal data?

We process all personal data in a manner that is safe and meets statutory requirements. We have carefully assessed the potential risks related to our processing procedures and have carried out appropriate risk management procedures.

Automated decision-making and profiling

Your personal data will not be 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 know whether your personal data is processed and what data is stored about you. The City of Helsinki will provide you with 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 inaccurate and incorrect personal data concerning you without undue delay. In addition, you have the right to the supplementation of incomplete data. Any incompleteness of the

data will be resolved by taking into account the purpose of the processing of the personal data in the register. If the City does not accept the person's demand for rectification, it will issue a written statement stating the reasons why the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned with the statement.

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

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 the public interest or the exercise of public authority vested in the City. In some exceptional cases – e.g. if the processing of data has been based on the person's consent and the person withdraws their consent – the person has the right to have their data erased, i.e. to be forgotten. If the City does not accept the person's demand for erasure, it will issue a written statement stating the reasons why the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned with the statement.

Right to restriction of processing (Article 18)

The personal client's right to restriction of processing is limited in Section 73(3) of the Act on the Promotion of Immigrant Integration. A registered personal client does not have the right to restrict the processing of the data in the register in accordance with Article 18. The limitation in question is a limitation of the data subject's rights set separately through legislative procedures in accordance with Article 23. In other respects, the data subject's rights are applied normally.

Right to data portability (Article 20)

The right to transfer personal data from one system to another is not applied when the processing is based on a public obligation. For this reason, this right does not apply to processing that is necessary for the fulfilment of a public obligation or the performance of a task carried out in the public interest, or in the exercise of an official authority vested in the City. The right to transfer data from one controller to another pertains to situations in which the person themselves has provided the controller with their personal data, and the processing of the data is based on consent or an agreement, and the processing is carried out automatically.

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 continue to be 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. The right to object does not exist when personal data is processed based on other grounds, such as the fulfilment of a statutory obligation.

Right to lodge a complaint with an 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. You also have the right to exercise other administrative and judicial remedies.

Office of the Data Protection Ombudsman

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Postal address: PO Box 800, 00531 Helsinki

Email: tietosuoja@om.fi

Switchboard: +358 29 56 66700

How to contact us for questions on data protection?

Contact details

Feedback: City Executive Office/Communications Department/Project Manager

Digital participation services: City Executive Office/Communications Department/Development Manager

Digital participation services for employees: City Executive Office/Strategy Department/Product Owner

Register Office, City of Helsinki

helsinki.kirjaamo@hel.fi

+358 9 310 13700

Data Protection Officer's contact details

Data Protection Officer of City of Helsinki

tietosuoja@hel.fi

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This privacy policy was last updated on 3 April 2025