



Privacy Policy

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

Processing of personal data for the City of Helsinki's lending register

Controller

City of Helsinki / City Board

Why and on what grounds do we process your personal data?

The purpose of processing personal data is to manage loans and guarantees granted by the City.

Data subjects include the City's debtors, guarantors or groups for whose loans the City has provided a guarantee.

The system helps charge the debtors for the loan interest and repayments, manage the accounting of the loans and guarantees and take care of the measures preceding legal debt collection.

Legal grounds for the processing of personal data

Processing of personal data regarding granting loans

Article 6, paragraph 1b 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.

Essential legislation

- Accounting Act (1336/1997)

What personal data do we process?

The system user data are imported by integration from the centralised user management system. Permissions are granted on the basis of an application from the supervisor. Incompatible duties are assessed in association with the granting of user rights.

With regards to invoicing, the data subject's identity and contact information and bank contact information are:

- The person's first and last name
- Personal identity code
- Address
- Bank account
- E-mail address
- Information on the loan guarantee

Where do we get personal data from?

The data are obtained from the data subject. We also obtain data from the account register, the Land Information Service provided by the National Land Survey of Finland and the real estate information services provided by Suomen Asiakastieto.

System user data is obtained from the city's centralised management system (AD).

If you do not deliver the necessary personal data to formulate the contract, the contract cannot be formulated and the loan cannot be granted.

With whom do we share your personal data?

Personal data may be disclosed to authorities as permitted and required by legislation, such as to the police and the National Enforcement Authority Finland, as well as other parties specified by legislation, such as a debt collection agency.

Tax authorities are informed yearly of the paid interests and loan capitals of loans.

Processors of personal data

The City may outsource the processing of your personal data to an external system supplier or service provider under a separate service contract. In such cases, the processing of personal data takes place on behalf of and for the benefit of the city, and for the purpose specified by the city. The City of Helsinki remains the data controller for your personal data. The city and the service provider are jointly responsible for the correct processing of your personal data.

Key processors

- CGI Finland Oy
- s4access
- Atos IT Solutions and Services Oy
- SAP

Will your personal data be transferred outside the EU or EEA?

The City of Helsinki ensures by default that your personal data is processed within the EU or EEA. However, in some cases, the city's services or operations may also be implemented using service providers, services and servers located elsewhere. In exceptional circumstances, your personal data may be transferred outside the EU or EEA to the United States. In this case, the personal data transfer mechanism complies with the EU-US data protection framework that Microsoft has committed to using. The General Data Protection Regulation sets strict criteria for the transfer of personal data to countries whose legislation on the processing of personal data deviates from the requirements of European data protection legislation. In such cases, the City of Helsinki undertakes to comply with the requirements for an adequate level of protection for personal data, and, where applicable, obliges the system suppliers and service providers it uses to secure the corresponding data protection obligations in accordance with data protection legislation.

How long do we store your personal data?

The client data are stored for the duration of the loan and 10 years after that. With regard to social lending, the data are stored for 30 years after the client relationship has ended.

Automated decision-making and profiling

We do not use automated decision-making and profiling.

Your rights with regard to the processing of your personal data

The rights of the data subject and instructions for exercising 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 to access data (right of access by the data subject, Article 15)

You have the right to know what personal data about you is being processed and 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 deadline is extended, the city will inform the person requesting the information of this within one month of receiving the request, and state the reasons for the delay.

If the city does not agree to the request, it will notify you of this no later than one month after receipt of the request. The city will also state the reasons for the refusal, unless it compromises the purpose of the refusal. You will also be informed at this time of the possibility of lodging a complaint with a supervisory authority and seeking other legal remedies.

Right to rectification of data (Article 16)

You have the right to demand that the City rectifies imprecise and inaccurate personal data without undue delay. In addition, you have the right to supplementation of incomplete data. The possible incompleteness of the data decided by taking into account the purposes of the processing.

If the City does not accept your demand to rectify the data, it provides a written testimonial in which it states the reason why the demand has not been accepted. You will also be informed at this time of the possibility of lodging a complaint with a supervisory authority and seeking other legal remedies.

Right to be forgotten (Article 17)

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

- You withdraw the consent on which the processing of personal data was based on and there are no other legal grounds for the processing.

- You object to your personal data being processed for direct marketing purposes.
- You object to the processing on grounds relating to your personal situation, and there is no well-grounded reason to continue the processing.
- Your personal data have been unlawfully processed.
- Your personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- Your personal data have been collected in relation to the offer of information society services and the case is about the personal data of a minor.

If the City does not accept your demand to erase the data, it provides a written testimonial in which it states the reason why the demand has not been accepted. You will also be informed at this time of the possibility of lodging a complaint with a supervisory authority and seeking other legal remedies.

The right to erasure does not exist if the processing is necessary for the compliance of the City's statutory obligations or it pertains to 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 your personal data be restricted for a period of time, until your data has been reviewed and duly rectified or supplemented. Such a situation could be, for example, if you dispute the accuracy of your data, in which case the processing of your data will be suspended until the city verifies its accuracy.

Right to object (Article 21)

You have the right, on grounds relating to your personal situation, to object at any time to the processing of your personal data, where the processing is based on legitimate interest, the performance of a task carried out in the public interest or in the exercise of official authority vested in the city. In this case, the data can be further processed only if there are compelling and legitimate grounds for the processing that can be demonstrated by the city.

The processing may also continue, if it 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 a supervisory authority if you consider that the processing of your personal data infringes the EU General Data Protection Regulation (EU) 2016/679. You also have the right to exercise other methods of administrative appeal and legal remedies.

[Office of the Data Protection Ombudsman](#)

Street address: Lintulahdenkuja 4

Postal address: PO Box 800, 00531 Helsinki

Email: tietosuoja@om.fi

Telephone exchange: +358 29 56 66700

Whom can I contact if I have questions about data protection?

Signing in as a user allows you to view data stored about you in several of City of Helsinki's systems. To rectify incorrect information, please contact the service from which the data originated.

Contact person:

Director, kanslia.antolainat@hel.fi

Person in charge of the register

According to a decision by the City Board (7 March 2022 § 182) on the responsibilities and duties related to registers in the City Executive Office, the person in charge of the register is the Director of the Financing Unit, as appointed by the Finance Director.

Contact information

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

Contact information of the data protection officer

City of Helsinki's Data Protection Officer

tietosuoja@hel.fi

+358 9 310 1691 (telephone exchange)

This Privacy Policy has been updated on 06 March 2026.