



Privacy Policy

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

Ownership data register of the Helsinki City Group

Controller

City of Helsinki / City Board

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

The purpose of the processing of personal data, as part of the City of Helsinki's ownership and corporate governance duties, is to manage information about the entities of the Helsinki City Group or other entities in which the city has the right to appoint board members and/or auditors based on the articles of association, statutes or shareholders' agreement. The data is also used for appointment processes, organisation of the City Group governance, and in the performance of tasks associated with communication and reporting on City Group governance.

The processing of personal data is associated with the person's current and/or future position or role in the Helsinki City Group, for example, as a member of the board or other body, CEO, COO, auditor or a person belonging to the group's management (for example, a CFO or Administrative Director).

Purposes of the processing

Contact information stored in the register may be used for communications necessary for the purpose of City Group governance tasks (for example, current affairs, training

information), data collection (for example, information necessary for required group reports), surveys (for example, board of director surveys) and the organisation of events and training.

The City of Helsinki may provide a list of email addresses of data subjects to an external service provider acting on behalf of the city that, based on the city's procurement, provides training aimed at the Helsinki City Group entities. The service provider then acts as a processor of personal data for the City of Helsinki. The service provider may, on this basis, carry out communications associated with the training events, field and track registrations, distribute training material and follow up on participation.

Legal grounds for the processing of personal data

The legal grounds for the processing of the aforementioned personal data are as follows:

In accordance with Article 6(1)(e) of the EU General Data Protection Regulation, the 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 (city ownership and governance duties).

The duties in the public interest and the processing for the exercise of official authority are authorised in particular in the following:

- Act on the Openness of Government Activities (621/1999)
- Act on Equality between Women and Men (609/1986)
- Local Government Act (410/2015)

Information on political party affiliation is processed only for elected officials, and only when the information is public, in line with Article 9(2)(e) of the EU General Data Protection Regulation.

What personal data do we process?

Name, gender, email, phone number, position, background (local government official/officeholder and city division or elected official and party or external expert),

education, professional title, description of your job's main content/area of responsibility, a brief description of the person as a board member, necessary knowledge and experience with regard to working on a board.

Data on political party affiliation is processed only if the person serves as an elected official and the party affiliation is public and, in accordance with the Municipalities Act, linked to the elected person's position and its assessment. The processing of the data is based on Article 9(2) of the EU General Data Protection Regulation because the data subject has explicitly made their political views public by serving in politics as an elected official. The data is used only to the extent that is necessary for carrying out the Helsinki City Group's statutory ownership and governance duties and to secure the position of elected officials in the appointment process. Data on political parties is not processed in relation to other groups of people, nor for other purposes.

Where do we get your personal data from?

Personal data is primarily obtained from the data subjects themselves (competence and consent surveys as well as other forms used in the appointment process) and is supplemented and updated with data obtained from the entities in question based on registers, such as the trade register association. Data can also be obtained from the City of Helsinki's case and document management system to the extent necessary for the purposes described in this privacy policy.

Some of the data (for example, name and contact information) is practically necessary for the appointment process and the carrying out City Group governance tasks. If the data subject does not provide the requested information, the city may not be able to assess the data subject's suitability for an appointment, carry out tasks associated with the appointment or organise contacts and reporting associated with the task.

To whom do we disclose or transfer your personal data?

The names and contact information of people appointed to Helsinki City Group entities are disclosed to the City Group entity in question for contact and entity administration

purposes. The data may also be disclosed within the City of Helsinki to different divisions and units to the extent necessary for carrying out statutory duties related to ownership and governance, and the organisation and reporting of administration. The names and contact information of data subjects may be disclosed to the City of Helsinki's external training service providers that provide training services that work on behalf of the City of Helsinki when they process personal data in order to send notifications and advertise about board training opportunities and follow up on participation on behalf of the City of Helsinki.

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 of Helsinki, to fulfil a purpose in accordance with the city's instructions.

The City of Helsinki remains the controller for your personal data and is responsible for the processing of personal data in accordance with the law. The personal data processor is, for their part, responsible for complying with the contract and data protection legislation.

The central groups that process personal data are system and cloud services providers and providers of training and event services that operate on behalf of the City of Helsinki. In this service, the central processors include Digia (system provision and maintenance) and Microsoft (cloud services platform Dynamics 365 and the related infrastructure services).

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, it may be possible that data is transferred to the United States. In this situation, the basis for the data transfer is justified by an adequacy decision and that the processor is certified in the Data Privacy Framework. 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 comply with the corresponding data protection obligations in the manner required by data protection legislation.

How long do we store your personal data?

As a rule, the storage period is calculated from the date that the term of office has ended, or the appointment process ends (if the person is not elected to the position). Personal data is stored as long as the person acts in their position on the board, body or other role described in this privacy policy or has been proposed for such a position. As a rule, data on board members is deleted two (2) years and six (6) months after the end of the board term as defined in the articles of association, unless the person is elected for a new board term. If a person resigns from their board position mid-term, the rule described above is still followed. For example: If a board term ends on 31 May 2026, the personal data is, as a rule, deleted by 30 November 2028 at the latest, if the person is not elected for a new term.

The personal data should be stored in the system for as long as the person holds the position or is proposed for it.

The data fields *Henkilön asema yhteisössä* (Position in the group) and *Tausta* (Background) are stored in the system as passive data for 10 years, after which they are deleted from the system, if it is necessary to fulfil the documentation and reporting obligations of ownership and group governance. The 10-year passive storage of these two fields only applies to the extent necessary to fulfil the documentation and reporting obligations of ownership and governance, otherwise the data is deleted in accordance with the main rules.

The competence and experience requirements of board members are saved in the system via a competence and consent survey that will delete itself from the system if the data are not renewed within two (2) years and six (6) months.

Automated decision-making and profiling

No automated decision-making or commercial AI applications or profiling is used in the processing of personal data.

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 notify 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 approve the request, it will notify the data subject 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 of Helsinki rectifies inaccurate and incorrect personal data about you without undue delay. In addition, you have the right to have incomplete data completed. Whether or not the data is incomplete will be determined by taking into account the purpose of the processing of the personal data.

If the city does not approve your request for rectification, it will issue a written certificate stating the reasons the request was refused. 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 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, corrected or completed in an appropriate manner. 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, if 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 processing of the data may continue only if the city can demonstrate compelling and legitimate grounds for the processing. 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](#)

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Telephone exchange: +358 29 56 66700

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

Contact person:

Helsinki City Group analyst, konserni@hel.fi

Person in charge of the register

According to a decision by the City Board (7 March 2022 § 182) on the responsibilities and tasks concerning registers in the City Executive Office, the person in charge of the register is the Director of City Group Governance, 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.