

# **Privacy Policy Linked Registration**

EU General Data Protection Regulation (2016/679)

#### **Data Controller**

City of Helsinki / City Board

#### Person in charge of the register

City Executive Office / Chief Digital Officer

# Why do we process your personal data?

The purpose of processing your personal data is to enable you to register for events, courses and volunteer work electronically. Registering with your name and email address is required to register electronically for events. Registrants can also receive additional information about events or be informed of changes to events via the registration service. At the start of an event, the event organiser processes personal data in order to confirm the attendees.

#### Legal basis for processing your personal data

The processing of your personal data is based on Article 6(1)(a) of the EU General Data Protection Regulation: The data subject has consented to the processing of their personal data and Article 9(2)(a) of the EU General Data Protection Regulation: The data subject has given explicit consent to the processing of those personal data.

#### What personal data do we process about you?

You log in to the registration service with your Helsinki profile. You log in to your Helsinki profile with your personal identification number. If you do not have a Helsinki profile, one will automatically be created when you log in. If you wish, you can read the privacy policy of the Helsinki profile here: <a href="https://www.hel.fi/static/liitteet-">https://www.hel.fi/static/liitteet-</a>

2019/Kaupunginkanslia/Rekisteriselosteet/Keha/Sahkoisten%20asiointipalveluiden%20rek isteri.pdf

When you register for an event, we process the following personal data: your first name, last name, street address, date of birth, zip code, city, and additional information. You will also be asked for your email address and telephone number and, if you are registering another person, your first and last name, membership card number, mother tongue and preferred language.

## How do we collect personal data?

We collect personal data from the data subjects when they log in to the registration service and fill in the form.

# To whom do we disclose your personal data?

No personal data will be disclosed.

## Personal data processors

The personal data in the registration service will be processed by Fulvisol Oy and Vincit Oy.

The city may outsource the processing of your personal data to an external system supplier or service provider under a separate service contract. In this case, the processing of personal data takes place on behalf of and on account of the city and for carrying out the purposes defined by the city. The city will remain the data controller for your personal data. The city and the service provider are jointly responsible for the appropriate processing of your personal data.

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

Your personal data will not be transferred outside the EU or EEA without agreements ensuring data protection.

By default, the City of Helsinki ensures that your personal data is processed within the EU or EEA. However, in some cases, the city's services or functions may also be implemented using service providers, services and servers located elsewhere. In this case, your personal data may also be transferred outside the EU or EEA. The General Data Protection Regulation sets strict criteria for transferring personal data to countries whose legislation on the processing of personal data deviates from the requirements of European data protection law. In this case, the City of Helsinki undertakes to comply with the requirements for an adequate level of protection for personal data, and, where applicable, commits the system suppliers and service providers it uses to ensure corresponding data protection obligations in accordance with data protection legislation.

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

Personal data in the registration service will be retained for five years. The personal data we collect when you register will be pseudonymised two weeks after the event ends.

## How do we protect your personal data?

We process personal data in a secure manner that complies with legal requirements. We have carefully assessed the potential risks associated with our processing activities and have taken measures to manage those risks.

### Automated decision-making and profiling

Your personal data will not be used for individual automated decisions or profiling.

## Your rights regarding the processing of your personal data

You can find the rights of data subjects and instructions on how to exercise them at: <a href="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">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</a>

#### Right to review 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 what data has been stored about you. The city 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.

## 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 in the register. If the city does not accept a person's demand for rectification, it will issue a written certificate stating the

reasons the demand was not accepted. In this context, you will also be informed of the possibility of lodging a complaint with a supervisory authority and seeking other legal remedies.

## Right to be forgotten (Article 17)

In some exceptional cases – for example, if the processing of data was based on the person's consent and they withdraw 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 certificate stating the reasons the demand was not accepted. In this context, you will also be informed 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 based on compliance with the city's statutory obligation or related to the performance of a task carried out in the public interest or the exercise of public authority vested in the city.

# Right to restriction of processing (Article 18)

In certain situations, a person may have the right to request that the processing of their personal data be restricted until their data has been duly verified and corrected or supplemented. Such situations include a person contesting the accuracy of their data, in which case the processing of their data will be restricted until the city verifies their accuracy.

#### Right to data portability (Article 20)

A person has the right to transfer their personal data from one controller to another if they have themselves provided the controller with their personal data, 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)

A person has the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data in which 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 can only be further processed if there is a substantial and justified reason for the processing that the city can 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 an 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. 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: PO Box 800, 00531 Helsinki

E-mail: tietosuoja@om.fi

Telephone exchange: +358 29 56 66700

# How can you contact us about privacy issues?

As a logged-in user, you can view your saved data in several city systems. You can request a correction to incorrect data in the service in which the data was generated.

Contact details: Product Owner, Strategy Department, City Executive Office

Registry, City of Helsinki

helsinki.kirjaamo@hel.fi

+358 9 310 13700

#### **Contact details of the Data Protection Officer**

City of Helsinki's Data Protection Officer

tietosuoja@hel.fi

09 310 1691 (telephone exchange)

This privacy policy has been updated on 13 November 2023