



Privacy Policy

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

Privacy policy for non-statutory services

Data controller

City of Helsinki/Board of Employment Services Enterprise.

In accordance with Section 6 of the decision by the Employment Services Enterprise on the responsibilities and tasks of the data controller (2 January 2025), the person in charge of the register is the Managing Director.

Why and on what grounds do we process personal data?

We process personal data to provide non-statutory services.

In the provision of non-statutory services, personal data is processed according to

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

Which personal data do we process?

The personal data that we may process in the services includes:

- Given names and last name
- Personal identity code
- Contact information

- Service language and other information on arranging access to services
- Information on education, employment history and vocational skills
- Information regarding the duration of unemployment and unemployment benefits
- Information on service access, client relationship and service needs assessment
- Information on work ability and functional capacity
- Other information that the project's financier and implementation may require.

The service may also process special categories of personal data, such as health data and mother tongue. In such cases, the processing is lawful under Article 9(2)(a) of the EU General Data Protection Regulation, according to which the data subject has given explicit consent to the processing of that personal data for one or more specified purposes.

The service may also process other personal data, which will be explained separately when consent is requested.

Where do we collect personal data from?

Data is obtained from the data subjects themselves and potentially from other data sources, explained separately to the client when consent is requested.

To whom do we disclose or transfer personal data?

Client data from fixed-term employment projects is disclosed to project financiers to the extent required by them. Data may also be disclosed to other parties based on legal provisions or the client's consent.

Is personal data transferred outside the EU or 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 carried out by a service provider located somewhere else, by using services and servers. In such cases, your personal data may also be transferred to a location outside the EU or the EEA, such as the United States. 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 adhering to similar data protection obligations, as prescribed in data protection legislation.

How long do we retain personal data?

For projects, data is retained for the period specified by the project financier, but no less than 10 years. For other non-statutory services, data is retained for 10 years.

Automated decision-making and profiling

We will not use your data for automated decision-making or profiling.

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 (right to access one's personal data, Article 15)

You have the right to know what personal data is being processed about you and what information has been stored. 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.

If the City refuses to fulfil your access request, it will inform you within one month of receiving the request. The City will also provide the reasons for the refusal, unless doing so would

compromise the purpose of the refusal. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned with the statement.

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. You also have the right to have incomplete data completed. Whether the data is incomplete will be determined based on the purpose of the processing of the personal data.

If the City does not accept your 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 (Article 17)

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

- You withdraw your consent on which the processing has been based and there is no other legal basis for the processing.
- You object to the processing of your data for direct marketing purposes.
- You object to the processing on grounds relating to your particular personal situation and there is no legitimate reason to continue the processing.
- Your personal data has been processed unlawfully.
- Your personal data must be erased in order to comply with a legal obligation under Union law or the national legislation applicable to the data controller.
- Your personal data was collected in connection with the provision of information society services and concerns the data of a minor.

If the City does not accept your demand for erasure, it will issue a written statement on the matter, 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.

This right does not apply to processing that is necessary for the fulfilment of the City's legal obligation, 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 the restriction of the processing of your personal data until your data has been properly verified, corrected or completed. Such situations include you contesting the accuracy of your data, in which case processing will be restricted for the period it takes the City to verify the accuracy of the data.

Right to data portability (Article 20)

You have the right to transfer your personal data from one controller to another only if you have provided your personal data to the controller yourself, the processing 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 official authority vested in the City.

Right to object (Article 21)

You have the right, based on your particular personal situation, to object at any time to the processing of your personal data when the processing is based on legitimate interests, the performance of a task carried out in the public interest or the exercise of 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 the City is able to demonstrate. The processing may also continue if it is necessary for the establishment, exercise or defence of legal claims.

Right to withdraw consent (Article 7)

If the legal basis for the processing of your data is consent, you have the right to withdraw your consent at any time. The City will inform you of this right when requesting your consent.

Withdrawing consent does not affect the lawfulness of processing carried out based on consent before its withdrawal.

Right to lodge a complaint with a supervisory 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). In addition, you have the right to exercise other administrative and judicial remedies.

[Office of the Data Protection Ombudsman](#)

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How to contact us regarding questions on data protection?

Contact person

Data protection specialist

Lawyer

tyollisyyspalvelut.tietosuoja@hel.fi

Person responsible

Employment Services Enterprise/Managing Director.

In accordance with Section 6 of the decision by the Employment Services Enterprise on the responsibilities and tasks of the data controller (2 January 2025), the person in charge of the register is the Managing Director.

Contact information

City of Helsinki

Contact information

Email: helsinki.kirjaamo@hel.fi

Postal address: PO Box 10

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Telephone: +358 (0)9 3101 3700

Data Protection Officer's contact details

City of Helsinki's Data Protection Officer: tietosuoja@hel.fi

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This privacy policy was last updated on 11 June 2025