



Privacy notice

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

Processing of personal data in Business Helsinki's customer and partner relationships

Controller

City of Helsinki / City Board

Purpose of the processing activity

The personal data stored in the register is processed for the purpose of activities related to the City's business, innovation and competitiveness policy and the promotion of entrepreneurship, tourism, destination management, employment and immigration matters carried out by the Economic Development Division (marketing name: Business Helsinki) of the Helsinki City Executive Office.

The processing activities include:

Services for start-up and existing enterprises, public and third sector services, managing customer and business/partner relationships, organising events and entrepreneur network activities

- marketing, events and communications
- processing of various subsidies and grants (grants to enterprises, also summer entrepreneurship programmes for young people) and reporting
- tourist information
- contractual networking in tourism and other targeted sectors
- work on mapping changes in the labour needs of enterprises.

Legal basis of processing

The processing of personal data for the purposes of managing services for start-ups, customer and business/partner relationships, organising events, entrepreneur networking and tourist information services is based on the following:

- 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.

The processing of personal data for the purpose of marketing and communications targeted at private individuals is based on the following:

- Article 6(1)(a) of the EU General Data Protection Regulation: the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

The processing of personal data for the purpose of marketing and communications targeted at communities is based on the following:

- 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. The data pertains to the data subjects' positions and tasks in public bodies, the private sector, organisations or other similar activities, and the purpose of the processing is in the public interest and the processing is proportionate to the legitimate purpose pursued by it, in which case the processing is legal under section 4 of the Data Protection Act.

The processing of personal data for the purpose of providing financial grants or subsidies to enterprises or entrepreneurs is based on the following:

- Article 6(1)(c) of the EU General Data Protection Regulation: processing is necessary for compliance with a legal obligation to which the controller is subject.

The processing of personal data for the purpose of carrying out tourism networking activities for businesses or entrepreneurs is based on the following:

- Article 6(1)(b) 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

- EU General Data Protection Regulation (679/2016)

- Data Protection Act (1050/2018)
- Local Government Act (410/2015)
- Act on public employment and business service (28.12.2012/916)

Which personal data do we process?

The City processes the following personal data for the purposes of managing services for start-ups, customer and business/business-partner relations, organising events and entrepreneur networking or mapping the labour needs of enterprises:

- name, contact information (including email address, phone number, social media contacts), gender, date of birth, language, customer service language and dietary information of the data subject
- name and business ID of a private trader's company
- education and competency data
- business plan, financial plans and similar plans disclosed by the customer in the context of customer advice
- data related to customer, business partner and advisory meetings and event activities
- professional title, photograph, event participation, meetings at events, interests, role at events, introduction text, schedule details, IP address

- data on the financial situation of a private trader disclosed in the context of customer advice
- customer feedback from business advisory services.

When the provision of a service involves the processing of specific diet-related personal data, such processing is permitted based on Article 9(2)(a) the EU General Data Regulation, according to which the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

The City processes the following personal data for the purpose of marketing and communications:

- name, contact details (including email address, phone number) and customer service language of the data subject.

The City processes the following personal data for the purposes of processing various subsidies and grants (grants to enterprises, also summer entrepreneurship programmes for young people) and reporting:

- name, contact details (including email address, phone number) and age of the data subject
- education and competency data
- data related to the labour market status of the data subject in the context of the summer entrepreneurship programme for young people.

The City processes the following personal data for the purpose of providing tourist information services:

- name and contact details (including email address, phone number) of the data subject
- chat messaging data, IP address, blocked chat participants.

How do we collect personal data?

The personal data is collected primarily from the data subjects themselves.

Personal data on the employees of companies, NGOs and other organisations may also be collected from public data sources (such as the Business Information System and the Finnish Patent and Registration Office) via APIs or discussion contacts.

Personal data may also be collected from organisations' public websites, through various social media services or by purchasing address lists from commercial operators.

To whom do we disclose your personal data?

Regular external disclosures:

- No regular external disclosures.

Disclosures within the City organisation:

- No regular internal disclosures.

Processors of personal data

The City may outsource the processing of your personal data (in order to provide its services) to an external system or service provider based on a separate agreement. In this case, the personal data is processed on behalf of the City and to fulfill 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 your personal data transferred outside of the EU or EEA?

The City uses a subcontractor to process the data in the customer relationship management system, due to which the data may be transferred outside the EU or EEA. Transfers outside of the EU or EEA are carried out according to the standard contractual clauses adopted by the European Commission.

How long do we keep your personal data?

Customer service processes – Services for start-ups, customer and business/partner relationship management, tourist information, networking based on a customer or contractual relationships and forecasting of the labour needs of enterprises:

- The personal data are stored for the duration of the customer relationship and thereafter for a period of five (5) years.

Marketing, communications and voluntary networking activities:

- The personal data are stored for the period during which they are in active use/the period for which consent has been given, or a maximum period of five years. The data subject may at any time request the

erasure of their data, in response to which said data is erased from the register.

Processing of various subsidies and grants (grants to enterprises, also summer entrepreneurship programmes for young people) and reporting:

- Financial documents are stored for a period of ten (10) years.

Automated decision-making and profiling

No automated decision-making and profiling is carried out.

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 imprecise and inaccurate 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 certificate stating the reasons why the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies is also mentioned in connection with the certificate.

Right to erasure, right to be forgotten, Article 17

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 certificate stating the reasons why the demand was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies is also mentioned in connection with the certificate. 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.

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 checked and corrected or supplemented. Such situations include a person denying the accuracy of their data, in which case the processing of their data is restricted for the time the City checks 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 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.

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). In addition, you have the right to exercise other administrative and judicial remedies.

Right to lodge a complaint with a supervisory authority

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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Switchboard: +358 29 56 66700

Contact persons for this privacy notice:

Team Manager, City Executive Office/Economic Development
Division/Enterprise Services/
Business Advisory Services

Tourist Director, City Executive Office/Economic Development
Division/Tourism and Destination Management

Person responsible for this privacy notice:

City Executive Office/Economic Development Division/Enterprise
Services/Director, Enterprise Services

In accordance with section 182 of the City Board decision on the responsibilities and tasks concerning register keeping in the City Executive

Office on 7 March 2022, the person in charge of the register is the Director of Unit appointed by the Director of Economic Development.

Contact information

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

Contact information of Data Protection Officer

Data Protection Officer of City of Helsinki

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This privacy notice was updated on 15 May 2024