



Privacy Policy

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

20/02/2023

Processing of personal data in the feedback channels and digital participation services of the City of Helsinki

1. Controller

City of Helsinki / City Board

2. Person in charge of the register

Job title

City Executive Office / Communications / Communications Director

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

3. Contact person for the register

Job title

Feedback: City Executive Office / Communications / Project Manager

Digital participation services: City Executive Office / Communications / Development Manager

Contact information

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

4. Contact information of the data protection officer

Data Protection Officer of the City of Helsinki

tietosuoja@hel.fi

09 310 1691 (telephone exchange)

5. Purposes of the processing of personal data and legal basis for the processing

Purposes of the processing

The purpose of the processing of personal data is to give residents the opportunity to participate in and influence the city's operations. Residents can give feedback on the city's operations through the city's feedback channel. Digital participation channels are used to collect residents' comments, opinions and development suggestions on matters and services that are being prepared.

Legal basis for the processing

Article 6, paragraph 1 a of the EU General Data Protection Regulation: the data subject has given consent to the processing. Participation and giving feedback are voluntary for city residents.

Article 6, paragraph 1 c of the EU General Data Protection Regulation: processing is necessary for compliance with a legal obligation to which the controller is subject. Residents have a right to participate in and influence the operations of the municipality.

Essential legislation

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Local Government Act (410/2015), Section 22
- Administrative Procedure Act (434/2003), Section 41
- Act on the Openness of Government Activities (621/1999)

6. Data content of the register

The personal data collected varies from one participation channel to another. Each participation and feedback channel contains information on what kinds of personal data are processed.

As a rule, the identification data and contact information collected in participation and feedback services is obtained from the data subject. Names, email addresses and telephone numbers are this kind of data. Moreover, the IP addresses of the users are stored on the server for investigating cases of malpractice.

Strong identification through the Suomi.fi service (in the future through the Helsinki profile) is required in the voting phase of the Omastadi.hel.fi service for participatory budgeting. At that point, data on the names, addresses, genders and ages of the participants is collected. When voting in the Omastadi.hel.fi and Nuortenbudjetti.hel.fi services, young people between 12 and 17 years of age identify themselves using the mPassID used in schools. Consequently, the following data is stored: first name, last name, calling name, municipality code, name of the municipality, school code, name of the school, class identifier and grade.

Data subjects are not asked to disclose special categories of personal data, but if the data subject chooses to disclose them, they are processed in accordance with article 9 of the Data Protection Regulation.

7. Regular disclosures of personal data

Personal data is not disclosed.

8. Transferring data in the register to third countries or international organisations (outside the EU or the EEA)

Personal data processed in the feedback service is not transferred outside the EU or the EEA.

Personal data collected in the digital participation services can be transferred outside the EU or the EEA.

Regarding the locations of the personal data, we refer to a decision by the City Manager (12 October 2022, HEL 2022-012014 T 00 01 01), according to which standard clauses approved by the European Commission must be included in the agreement on transferring when public personal data referred to in the Act on the Openness of Government Activities if transferred outside the EU or the EEA.

9. Principles for protection of the data

The data is processed in various systems for the purposes for which it was collected. The data can also be used for statistical and research purposes. As a rule, data used for statistical and research purposes is anonymised so that it cannot be used to identify any individuals. The data is stored, filed, deleted and otherwise processed according to the document management plan and the data security and data protection directives. The data is stored according to appropriate data security requirements.

10. Automated decision-making and profiling

Personal data is not used for automated individual decision-making or profiling.

11. Data storage periods

Feedback and associated personal data are stored for five years before being anonymised.

Personal data obtained through the strong identification in the participatory budgeting service is deleted from the system after five years. Users' ideas, suggestions and plans are stored for ten years before the personal data is anonymised.

Personal data collected through other participation channels is stored for ten years.

12. Sources of personal data

The data is mostly obtained from the data subject as he or she registers as a user or submits his or her email address to the service in order to receive a reply or monitor the processing of the feedback.

The data obtained through strong identification is obtained through the Helsinki profile and Suomi.fi services and the mPassID service for school pupils.

13. Rights of the data subject

The rights of the data subject and instructions for their enforcement can be found at:

<https://www.hel.fi/helsinki/fi/kaupunki-ja-hallinto/tietoa-helsingista/tietosuoja/tietosuojasta-tarkemmin> (in Finnish)

14. Right to lodge a complaint with a supervisory authority

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. This right shall be without prejudice to any other administrative or judicial remedy.

[Office of the Data Protection Ombudsman](#)

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