

## **Privacy notice**

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

## **Processing of personal data in client relationships and partnerships of the City of Helsinki Economic Development Division**

### **Controller**

City of Helsinki / City Executive Board

### **Purposes of processing**

The personal data in the register is processed by the City of Helsinki's City Executive Office Economic Development Division, for the purpose of carrying out its duties, for example under the brands of Helsinki, Business Helsinki or International House Helsinki. These duties relate to the city's economic, innovation and competitiveness policy, the promotion of entrepreneurship, tourism and destination services, and employment and immigration matters.

This processing activity includes, for example:

Services for start-up and existing companies/organisations, services for the public and third sectors, management of client and

company/partner relationships, project and programme activities, organisation of events (and training sessions and information sessions), entrepreneurial network activities, and research related to the activities of the Economic Development Division.

The examples of processing activities described above include, among other things, the provision of the following services:

- Direct marketing.
- Mapping of changes in labour demand.
- Marketing, events and communications.
- Network activities related to tourism and other destination sectors.
- Processing of various forms of support and grants (support for companies, including youth summer entrepreneurship).
- Production of information on the progress and evaluation of the service process for the client and the service organiser.
- Promotion of relocation and the provision of employer services.
- Relocation support services such as conducting interviews, counselling, and recording client contacts related to service guidance.
- Services for international talents such as conducting interviews, counselling, and recording client contacts related to service guidance.
- Tourism advisory services.

### **Why do we process your personal data and on what legal basis?**

When marketing and communications are targeted at private individuals, personal data are processed as follows:

- **Based on Article 6(1)(a) of the EU General Data Protection**

**Regulation:** The data subject has given consent to the processing of their personal data for one or more specific purposes.

When contract-based services or network activities targeted at companies/organisations are implemented, personal data are processed as follows:

- **Based on 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 a party, or for the implementation of pre-contractual measures taken at the request of the data subject.

When managing company/partner relationships and related network activities, and when providing services, events and communications to companies/organisations, as well as when managing private individuals' client relationships and related network activities and organising services for private individuals, personal data are processed as follows:

- **Based on 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 concerned relate to a person's position, duties and the performance of those duties in a public authority, business life, organisational activities or other comparable activities, and the objective of the processing is in the public interest and the processing is proportionate in relation to the legitimate aim pursued, whereby the processing is lawful pursuant to Section 4 of the Data Protection Act.

For direct marketing purposes, we request consent in accordance with Sections 200 (private individuals) and 202 (companies) of the Communications Services Act.

### **Which personal data do we process?**

When providing services for start-up and existing companies/organisations, managing client and company/partner relationships, organizing management of project and programme activities, organising events and entrepreneurial network activities, or mapping the labour needs of companies/organisations, the personal data processed may include:

- The data subject's name, contact details (e.g. postal address, email address, phone number, social media contact details), gender, date of birth, language, client service language, education and competence information, job title, employer information and dietary information.
- For a private trader, the company name and business ID.
- Other personal data provided by the client in connection with documents and client work, such as information related to the client's business activities and financial situation.
- Personal data that may be included in client feedback and surveys.

When processing various forms of support and grants (support for companies/organisations, including youth summer entrepreneurship) and carrying out reporting, the personal data processed are as follows:

- The data subject's name and contact details.
- Education and competence information.
- In the youth summer entrepreneurship programme, data related to labour market status are processed.

When providing tourism advisory services, the personal data processed are as follows:

- The data subject's name and contact details.

When providing immigration services, the personal data processed are as follows:

- The data subject's name, contact details, gender, and date of birth.
- Information related to moving to Finland (including citizenship, country from which the person has moved to Finland, date of relocation / length of residence in Finland, information of move-related service needs).
- Education and competence information (including language skills, educational background, profession, work experience and skills, employment status, and interests).
- Information on whether the client is a client of employment services (yes/no); if yes, which employment-promoting service the client may be participating in during the career track. Access to this information is restricted.

When carrying out marketing, events and communications of the Economic Development Division, the personal data processed are as follows:

- The data subject's name, contact details, language and client service language.
- Additional information necessary for organising events may include:
  - Additional consents (e.g. consent for photography).
  - Background information of the registrant or participant.
  - Education and competence information.
  - Exhibitor information.
  - Information on how the person became aware of the event.
  - Objectives for participating in the event.
  - Other event-specific information (e.g. participation in a follow-up event).
  - Professional competence.

- o Work history.
  
- If necessary for participation in the event, information such as details of the client's assistive devices or information on a personal assistant may also be processed.
- In addition, information necessary for organising the event may be processed (e.g. participation in the event either on site or via a remote connection).

When, in connection with organising an event, special categories of personal data related to a person's diet are processed, such processing is permitted on the basis of 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 those personal data for one or more specified purposes.

When conducting research related to the activities of the Economic Development Division and the activities mentioned above, the personal data specified for each activity will be processed. If additional personal data needs to be processed for the research, a separate notice will be provided before such data is processed.

### **From where do we collect your personal data?**

Personal data are primarily collected from the data subjects themselves.

Where employees of companies/organisations are concerned, personal data may also be collected from public data resources (e.g. the Business

Information System (YTJ), the Finnish Patent and Registration Office (PRH)) through interface implementations or by using viewing connections.

Where employees of companies/organisations are concerned, personal data may additionally be collected from public websites, through various social media services, or by purchasing address lists from commercial operators.

If the legal basis for the processing of personal data is a contract (e.g. network activities) and you do not provide the requested personal data, this may mean that the contract cannot be concluded. The absence of a contract in such a situation may prevent participation in the activities covered by the contract.

### **To whom do we transfer or disclose your personal data?**

Data are disclosed to requesting authorities in accordance with the Act on the Openness of Government Activities. Data and documents are public unless they have been specifically prescribed by law to be confidential.

If data is disclosed for research purposes or to partners involved in the design and/or implementation of the service offered to the data subject, a data disclosure agreement will be concluded with the receiving controller.

- With your consent, we may disclose your contact details to the member companies of Helsingin Uusyrityskeskus ry for advisory purposes.

## **Regular external disclosures:**

- No regular external disclosures.

## **Internal disclosures within the city:**

Data may be disclosed with consideration within the city of Helsinki to another controller to meet the customer's service needs or for research purposes.

- No regular internal disclosures.

## **Processors of personal data**

The city may outsource the processing of personal data (for the implementation of its services) to an external service provider under a separate commissioning agreement. In such cases, personal data are processed on behalf of and for the account of the city, and for the purpose determined by the city.

The city remains the controller of the personal data. The city and the service provider are jointly responsible for ensuring the appropriate processing of your personal data.

Examples of groups of personal data processors include:

- Providers of development services.
- Providers of marketing and communications services.
- Providers of event and service production services.
- Providers of information system and platform services.

## **Is your personal data transferred outside of the EU or EEA?**

The city uses a subcontractor for data processing in the customer relationship management system, and data may be transferred outside the EU or the EEA.

We do not transfer your data outside the EU or the EEA unless the transfer mechanisms required under Chapter V of the EU General Data Protection Regulation (2016/679) have been ensured.

## **How long do we keep your personal data?**

When managing services for companies/organisations, client and company/partner relationships, processing various forms of support and grants for companies/organisations, network activities based on a client or contractual relationship, activities based on anticipating the labour needs of companies/organisations, and when targeting marketing, events and communications at companies/organisations, personal data are retained as follows:

- For a maximum of five years from the most recent service event.

When managing services targeted at private individuals and when targeting marketing, events and communications at private individuals, personal data are retained as follows:

- For a maximum of five years from the most recent service event.
- If the processing of personal data is based on consent, personal data are not processed after the consent has been withdrawn.

When carrying out tasks related, for example, to project or programme activities implemented with external funding, personal data are retained as follows:

- For the period specified by the funder's archiving requirements, for a maximum of ten years.

To fulfil obligations related to information security and data protection, log data are collected from the systems used in the provision of services, and the personal data related to such logs are retained as follows:

- Monitoring history for 12 months (customer relationship management system) and a retention period of five years for log data (customer relationship management system).

### **Automated decision-making and profiling**

No automated decision-making or profiling is carried out.

## **Rights concerning the processing of your personal data**

Rights of data subjects and instructions on how to exercise them can be found from:

<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**

*The right applies to the processing of personal data where the legal basis for the processing is a statutory duty, a task carried out in the public interest or the exercise of official authority, as well as to processing based on the data subject's consent or a contract.*

You have the right to know what personal data is processed about you and what data is stored about you. 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 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 carry out your request for access, it will inform you of this within one month of receiving the request. The city will also state the reasons for the refusal, unless this would jeopardize the purpose of the refusal. You will also be informed of the possibility of lodging a complaint with the supervisory authority and of judicial remedies.

### **Right to rectification, Article 16**

*The right applies to the processing of personal data where the legal basis for the processing is a statutory duty, a task carried out in the public interest or the exercise of*

*official authority, as well as to processing based on the data subject's consent or a contract.*

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.

If the city does not accept the person's demand for rectification, it will issue a written certificate stating the reasons 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**

*The right applies to the processing of personal data where the legal basis for the processing is the data subject's consent or a contract.*

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

- You withdraw your consent on which the processing was based on and there is no other legal basis for the processing.
- You object to the processing of your data for purposes of direct marketing.
- You object to the processing on grounds relating to your particular situation and there are no overriding legitimate grounds for the processing.
- Your personal data has been unlawfully processed.
- Your personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- Your personal data has been collected in relation to the offer of information society services and it concerns the personal data of a minor.

If the city does not accept your request for erasure, it will issue a written certificate stating the reasons why the request 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 public interest or the exercise of public authority vested in the city.

## **Right to restriction of processing, Article 18**

In certain situations, *you may have the right to request that the processing of your personal data is restricted until your data has been duly checked and corrected or supplemented.* Such situations include when you deny accuracy of your data, in which case the processing of your data is restricted for the time the city checks its accuracy.

## **Right to data portability, Article 20**

*You have the right to transfer your personal data from one controller to another if you have provided the controller with your personal data by yourself, 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**

*The right applies to the processing of personal data where the legal basis for the processing is a task carried out in the public interest or the exercise of official authority.*

You have the right to object at any time on grounds relating to your personal situation to the processing of your 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 be further 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 defense of legal claims.

## **Right to withdraw consent, Article 7**

*When the processing of your personal data is based on consent, you have the right to withdraw your consent at any time. When the city asks you to give the city your consent, you are informed of this right at the same time.*

The withdrawal of consent does not affect the lawfulness of processing done prior to the withdrawal of consent.

## **Right to lodge a complaint with an authority, Article 77**

*You have the right to lodge a complaint with the supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the EU General Data Protection Regulation. In Finland, this supervisory authority is the Data Protection Ombudsman. 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: PL 800, 00531 Helsinki  
Email: tietosuoja@om.fi  
Switchboard: 029 56 66700  
www-address: <https://tietosuoja.fi/en/home>

## **How can you contact us for questions related to data protection?**

Enquiries regarding this privacy notice should be sent to the email address [elinkeino-osasto@hel.fi](mailto:elinkeino-osasto@hel.fi)

## **The person responsible for the service**

- Team Manager, City Executive Office / Economic Development Division / Business Services / Business Advisory Services
- Tourism Manager, City Executive Office / Economic Development Division / Tourism and Destination Services
- Team Manager, City Executive Office / Economic Development Division / Migration Affairs / International Talents Team
- Team Manager, City Executive Office / Economic Development Division / Migration Affairs / Relocation Team

## **Person responsible for this privacy notice:**

City Executive Office / Economic Development Division / Business Services Unit / Director, Business Services

In accordance with the decision of the city Executive Board of 7 March 2022, Section 182, concerning responsibilities and duties related to the city Executive Board's registers within the city Executive Office, the person responsible for the register is the head of the unit appointed by the Director of Economic Development.

## **Contact information:**

Helsingin kaupunki, *Kirjaamo PL 10 (Pohjoisesplanadi 11-13), 00099, City of Helsinki*

## **Contact information of Data Protection Officer:**

Data Protection Officer of City of Helsinki, tietosuoja@hel.fi, 09 310 1691 (switchboard)

This privacy notice has been updated on April 1<sup>st</sup> 2026.