



Privacy Policy

EU General Data Protection Regulation (2016/679)

8 December 2020

## **Register for the Tule liikuttamaan henkilöstöä experiment**

### **1. Controller**

The City of Helsinki acts, in accordance with Article 26 of the General Data Protection Regulation, as the joint controller with all the companies that have participated in the experiment. However, each company that has participated in the experiment is a joint controller with the City of Helsinki only in terms of the personal data collected in their own operations. The companies participating in the experiment are thus not joint controllers in relation to each other.

#### **1. Helsinki City / Executive Office / Director of Economic Development**

*Companies:*

#### **2. Fibion Oy**

Business ID: 2603410-2

#### **3. Cuckoo Workout Oy**

Business ID: 2612255-9

#### **4. Healthfactory Oy**

Business ID: 2619009-2

## **2. Person in charge of the register**

### **1. Helsinki City / Executive Office / Director of Economic Development**

Economic Development / Head of Innovations and New Experiments

### **2. Fibion Oy**

Ari Peltoniemi  
ari.peltoniemi@fibion.com

### **3. Cuckoo Workout Oy**

CEO Veera Lehmonen  
info@cuckooworkout.com

### **4. Healthfactory Oy**

Data Protection Commissioner  
Miika Karmitsa miika@syketribe.fi

## **3. Contact person for the register**

### **1. Helsinki City / Executive Office / Director of Economic Development**

Economic Development / Innovations and New Experiments / Special Planner :

City of Helsinki, Registry Office,  
P.O.B. 10 (Pohjoisesplanadi 11–13)  
00099 City of Helsinki

### **2. Fibion Oy**

Ari Peltoniemi  
ari.peltoniemi@fibion.com

### **3. Cuckoo Workout Oy**

Veera Lehmonen  
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### **4. Healthfactory Oy**

Terhi Immonen  
terhi@syketribe.fi

## **4. Purposes of the processing of personal data and the legal grounds for the processing**

### **Purposes of the processing**

The purpose of the processing of personal data is carrying out the “*Tule liikuttamaan henkilöstöä*” experiment initiated by the City of Helsinki. The experiment is carried out to find digital or otherwise innovative and commercially potential solutions, which further the physical activity of the personnel of the City of Helsinki.

The companies participating in the experiment may process personal data outside the experiment as well. In terms of this processing, they act as independent controllers and define their own purpose of personal data processing and legal basis for the processing.

### **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 of his or her personal data for one or more specific purposes.

### **Essential legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)

## **5. Data content of the register**

### **1. Helsinki City / Executive Office / Director of Economic Development**

The companies participating in the "*Tule liikkutamaan henkilöstöä*" experiment collect personal data that are necessary to the execution of the experiment. The City of Helsinki does not collect personal data in the experiment.

### **2. Fibion Oy**

The experimenters may participate anonymously in the privacy protection survey, which introduces the members to the privacy protection practices of the FAO programme. It is possible to register for Fibion measuring through the survey. The following anonymous data are collected in the survey: background data, awareness of privacy protection, experience and tendencies, the experienced efficiency of the privacy statement and participation in the programme.

The address data are collected for sending the Fibion measuring device, as well as the following background data, which are used for producing Fibion reports: gender, year of birth, length, weight, typical bedtime, typical wake-up time, starting date for the measuring, end date for the measuring and possible additional information. Additionally, the background data includes a short survey about the participants' ways of life.

Survey about well-being at work, whose data are linked to the Fibion measurements on a case-by-case basis for people participating with their names. The data are used as average values in the results for the work community level. The following data are collected in the survey: nature of work, activity opportunities and activity routines of the workplace and work community.

The participants complete tasks and challenges, which encourage changes in life, and in connection to these, data is collected about the completion of the tasks as challenges, as well as statistical data about the web use of the participants. The completion data are linked to the person for those who participate with their names.

The anonymous final feedback is compiled with a questionnaire, which includes the following data: gender, age group, voluntary unit and position and opinions about the usefulness of the programme, effectivity in terms of changes in life, communications practices, data systems, data protection practices, school grade for the programme and possible recommendations and development suggestions.

### **3. Cuckoo Workout Oy**

The following data are collected about the visitors based on their visit:

- Browser data, such as IP address, name and version of the browser, name and version of the operating system.
- Sites opened
- Possible references, through which the user has found the website Web forms are used to collect the following data:
- Identification data, such as name, name of the company, e-mail and telephone number

The communications tool Intercom is used to collect the following data:

- The debaters individual identifier
- The debate and its messages
- Browser data, such as IP address, name and version of the browser, name and version of the operating system.

### **4. Healthfactory Oy**

- Unit, job description and chosen training of the employees
- Customer activity and training data, which may include the following:

- Contact information, such as name, address, telephone numbers, e-mail addresses
  - Registration data, such as username, pseudonym, password and other possible identifier
  - Age, gender
  - Data on the use of services, such as browsing and search data
- GPS data and activity data collected by a mobile device, chosen and disclosed by separate consent from the user
  - Data from an electronic preliminary data form (e.g. everyday habits, activity data)
  - Training and follow-up data reported through the portal
  - Technical data on the use of the services, such as the IP address may also be collected

## **6. Regular disclosures of personal data**

### **1. Helsinki City / Executive Office / Director of Economic Development**

Personal data is not be disclosed to other parties, including parties outside the EU or the EEA.

### **2. Fibion Oy**

The data collected in the FAO programme are confidential. In the production of the FAO programme, personal data may be disclosed only to data processing company SL-valmennus, a subcontractor for Fibion Oy, which is committed to the company's data protection practices. SL-valmennus is in charge of, e.g. carrying out the Fibion measurements.

The personal data of the FAO programme is always stored in protected data centres in Finland and the EU area.

### **3. Cuckoo Workout Oy**

The communications tool on the website, Intercom, operates in the USA and saves data outside the EU and the ETA. An agreement concerning the processing of personal data has been signed between Cuckoo and Intercom. The agreement includes the standard clauses approved by the European Commission about the transferring of data to third countries. Confidential data or data belonging to special personal data groups cannot be transferred to third countries.

We transfer user data only for the purpose and to the extent that providing necessary customer services and sales requires.

### **4. Healthfactory Oy**

Personal data in the register are never given or disclosed to third parties.

The data collected in the project are saved during the project into SYKE Tribe's network training system. The data are saved on Finnish servers, located in Finland (Telia-Nebula). At the end of the project, we will also use a form services (contactform) to collect anonymous feedback and experiences. This data is collected without names or e-mail addresses.

### **7. Data storage periods**

The personal data collected in the "*Tule liikuttamaan henkilöstöä*" experiment are deleted after the experiment, if the registered participant does not decide to continue acquiring the service and separately approves the use of their personal data after the experiment as well. If a company participating in the experiment is entitled to processing personal data collected in connection to it outside the experiment as an independent controller as well, it is in charge of defining the storage period for the data.

## **8. Sources of personal data**

### **1. Helsinki City / Executive Office / Director of Economic Development**

The City of Helsinki does not collect personal data in the experiment.

### **2. Fibion Oy**

The personal data is collected directly from the participants by means of protected web forms. In the Fibion measurements, data about the physical activities of the participants are collected with a Fibion measurement device.

### **3. Cuckoo Workout Oy**

Data is added to the register both through submission by the data subjects themselves and through the controllers own actions (service fee data). If necessary, the data is checked from the population register or similar data sources.

The collection of data is done with existing web technologies, third party services and as a consequence of the individual actions of the visitors.

Technologies and services for the collection of data are Google Analytics, Google Adwords, Google Search Console, Leadfeeder, monitoring cookies, Intercom and web forms.

### **4. Healthfactory Oy**

The data is obtained from the data subjects. Tools offered by third parties, such as Google Analytics, may also be used for collecting and using non-personal data. Google Analytics collects and saves data such as: visiting times of Internet websites, visiting time of individual web pages on websites, the visitor's IP address, pages visited, the OS used by the visitor and device data. Data from the data subject's data sources (e.g. Apple Health) may be collected subject to consent.