



## **Privacy Policy**

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

## **City Museum image service data file (Helsinkiphotos.fi)**

### **Data controller**

The duties of the data controller were delegated to the Cultural Director by the Culture and Leisure Committee's decision on 27 March 2018, Section 71.

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

The purpose of Helsinkiphotos.fi image service data file is to provide customers with access to the Helsinki City Museum photo collection information and photos. In addition the data is used to provide the data subjects personalized user experience in the image service.

### **Legal basis for processing**

The legal basis for processing is Article 6(1), paragraph e of the General Data Protection Regulation (EU): 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 legal basis for processing personal data in connection with personalized user experience is Article 6(1), paragraph a of the General Data Protection Regulation (EU): the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

### **Key legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Museums Act (1492/2016)

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

We mainly process photographs of public situations, some of which feature identifiable individuals. In addition, images may contain descriptive information (e.g. place of capture, personal names, and date). As for customer registry data, the collected information consists of a username, email address, and password.

## **Where do we collect your personal data from?**

Personal data is obtained from the museum's collection management system and transferred via the Finna service to the image service registry Helsinkiphotos.fi. Data relating to personalized use of the service is obtained from the data subjects themselves.

## **Who do we disclose or transfer your personal data to?**

Data is not regularly disclosed from the register.

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

The data is not transferred outside the EU or EEA.

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

Personal data contained in the image collection is retained indefinitely. Personal data of those with Helsinkiphotos.fi users is retained for 12 months after the last login.

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

The processing of personal data does not involve automated decision-making or profiling.

## **Your rights related to the processing of your personal data**

The rights of the data subject and instructions for exercising 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 to data (right to access your data, Article 15)**

You have the right to know what personal data is being processed about you and what information has been stored about you. The city will provide the information without undue delay, at the latest within one month of receiving the request. The deadline may be extended by up to two months if the request is exceptionally large and complex. If the deadline is extended, the city will inform the data requester of this within one month of receiving the request and the reasons for the delay.

If the city refuses to fulfill your access request, it will inform you of this no later than one month after receiving the request. The city will also inform you of the reasons for the refusal, unless it would jeopardize the purpose of the refusal. At the same time, you will be informed about the possibility to lodge a complaint with the supervisory authority and to use other legal remedies.

## **Right to rectification of data (Article 16)**

You have the right to request that the city rectify any inaccurate or incorrect personal data about you without undue delay. Additionally, you have the right to have incomplete data completed. Any potential incompleteness of the data will be addressed by considering the purpose of the processing of the personal data.

If the city does not accept your request for rectification of the data, it will provide a written statement outlining the reasons for not accepting the request. At the same time, you will be informed about the possibility to lodge a complaint with the supervisory authority and to use other legal remedies.

## **Right to be forgotten (Article 17)**

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

- You withdraw the consent you provided, on which the processing was 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 based on a personal, specific situation, and there is no justified reason to continue the processing.
- Your personal data has been processed unlawfully.
- Your personal data must be deleted in order to comply with a legal obligation to which the data controller is subject under Union law or the law of a member state.

- Your personal data was collected in connection with the provision of information society services, and it concerns the personal data of a minor.

If the city does not accept your request for deletion of data, it will provide a written statement outlining the reasons for not accepting the request. At the same time, you will be informed about the possibility to lodge a complaint with the supervisory authority and to use other legal remedies.

The right to deletion of data does not apply if the processing is necessary for the city to comply with a legal obligation, is related to the performance of a task carried out in the public interest, or involves 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 the restriction of the processing of your personal data for the time it takes to properly verify, correct, or complete your data. Such situations include, for example, if you dispute the accuracy of your data, in which case its processing will be restricted while the city verifies its accuracy.

### **Right to data portability (Article 20)**

You have the right to transfer your personal data from one data controller to another only if you have provided the data controller with your personal data, and 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 for the exercise of public authority vested in the city.

### **Right to object (Article 21)**

You have the right to object to the processing of your personal data at any time, based on your personal, specific situation, when the processing is based on legitimate interest, the performance of a task carried out in the public interest, or the exercise of public authority vested in the city. In this case, the data can only be processed further if there is a compelling and legitimate reason for the processing, which the city can demonstrate. Processing may also continue if it is necessary for the establishment, exercise, or defense of legal claims.

## **Right to withdraw consent (Article 7)**

When 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 your right to withdraw your consent when requesting your consent.

The withdrawal of consent does not affect the lawfulness of the processing based on consent that was carried out before the withdrawal.

## **Right to lodge a complaint with a supervisory authority (Article 77)**

You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data violates the General Data Protection Regulation (EU) 2016/679. In addition, you have the right to use other administrative remedies as well as legal remedies.

### [Office of the Data Protection Ombudsman](#)

Visiting address: Lintulahdenkuja 4

Postal address: P.O. Box 800, 00531 Helsinki

Email: tietosuoja@om.fi

Phone switchboard: 029 56 66700

## **How can you contact us about data protection matters?**

kuva.tietosuoja@hel.fi

### **Contact person**

Chief curator, Picture Browsery

### **Person in charge**

Helsinki City Museum Director

### **Contact details**

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

[kuvakokoelmat@hel.fi](mailto:kuvakokoelmat@hel.fi)

**Contact details of the Data Protection Officer**

Data Protection Officer of the City of Helsinki

tietosuoja@hel.fi

09 310 1691 (switchboard)

This privacy policy was last updated on 1.8.2025