



## **Privacy Policy**

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

# **Collection management data file of the Helsinki City Museum and the HAM Helsinki Art Museum Foundation**

## **Controller**

The controller is the Culture and Leisure Committee, which delegated the controller's tasks to the Director of Culture on 27 March 2018, Section 71.

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

The MuseumPlus collection management system stores, processes and updates descriptive data and metadata related to the collections and collection objects of both museums or the collections and collection objects managed by them, as well as exhibition activities, circulation of works, research projects and cultural environment data. In addition, the system manages the most important collection management processes of both museums (such as circulation of works and loans, acquisitions, removals, conservation, location information).

The purpose and task of the processing is to accumulate and preserve the information resource as part of the general cultural capital, history and history of fine arts. The processing is necessary to perform the basic task of the museums. Personal and contact data are also stored for the purpose of maintaining contact, requesting additional information, transmitting information and securing copyright and ownership information and identifying objects.

## **Legal basis for processing**

The legal basis for processing personal data is 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.

In accordance with Section 4(4) of the Data Protection Act, personal data may be processed in accordance with Article 6(1)(e) of the Data Protection Act if the processing of research materials containing personal data, cultural heritage materials and personal data related to their descriptive information for archiving purposes is necessary and proportionate to the public interest objective pursued and the rights of the data subject.

## **Key legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Museum Act (1492/2016)
- Copyright Act (404/1961)

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

The personal data recorded in the MuseumPlus collection management system forms a personal register, the content of which consists of: surname and first names, other names such as artist names, dates of birth, gender, citizenship, marital status, relationships between individuals, school and general biographical information. Some of the registered data also includes contact information (telephone number, email and postal address).

More detailed breakdown:

- name information of the creators, designers and manufacturers of objects (including works of art and photographs)
- name information of the users and previous owners of objects (including works of art and photographs)
- name information of photographers of objects (including works of art and photographs)
- name information of photographers other than those who take pictures of works of art

- name information of the copyright holders of objects (including works of art and photographs) and images.

Name and contact information related to the management of collection processes:

- name and contact information of persons related to the stages, acquisition and addition of objects (including works of art and photographs) to the collection
- name and contact information of persons related to the lending, conservation, deposit of works of art and photographs and removals from the collection.

Personal data processed for scientific and historical research:

- names of persons who are the subjects of objects (including works of art and photographs) and who are presented with them
- names of persons who have provided additional information about the content, technical implementation and data of objects (including works of art and photographs) and about the artist
- names and email addresses of users with access to the system.

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

Personal data is obtained as part of collection acquisitions from the data subject or their representative. In other respects, as a result of the data controller's own activities - the management of the statutory tasks of museums (catalogue, research and collection management work) - from documents, archives, open data sources and from the data subjects themselves.

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

A separately defined part of the metadata of the collection objects, including limited name and role information (photographer, artist, manufacturer, user, designer), is transferred from the MuseumPlus collection management system to the joint Finna search service of Finnish museums, libraries and archives (<https://www.hkm.finna.fi/> and <https://www.ham.finna.fi/>) and to the Europeana portal (<https://www.europeana.eu/fi>) and, for the materials of the Helsinki City Museum, to the separate Helsinki City Museum image portal [Helsinkikuvia.fi](http://Helsinkikuvia.fi) ([www.helsinkikuvia.fi](http://www.helsinkikuvia.fi)).

Grounds for the transfer of data to the above-mentioned services: Making the collection known and researching. Improving the availability of information on cultural heritage in accordance with the Museum Act. The personal data transferred is name information, such as the artist's name, the manufacturer's name or the photographer's name.

## **Processors of personal data**

The city can outsource (in order to implement its services) the processing of your personal data to an external system supplier or service provider with a separate assignment agreement. In this case, personal data is processed on behalf and on behalf of the city, and to fulfill the purpose determined by the city. The city remains the registrar of your personal data. The city and the service provider are jointly responsible for the appropriateness of the processing of your personal data.

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

No regular transfers outside the EU or EEA.

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

The data in the collection management and information system is permanently stored in accordance with the legislation and processing basis underlying the operations of museums, based on the public interest/publicly beneficial archiving purpose.

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

Data stored in the collection management system is not used for automated decision-making or profiling.

## **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**

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**

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**

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**

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: P.O.Box 800, 00531 Helsinki

Email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Switchboard: 029 56 66700

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

[kuva.tietosuoja@hel.fi](mailto:kuva.tietosuoja@hel.fi)

### **Contact person**

Curator of Picture Collections, Helsinki City Museum

Collection Manager, HAM Helsinki Art Museum Foundation

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

Director of the City Museum

Director of the Art Museum of the HAM Helsinki Art Museum Foundation

**Contact information**

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

**Contact information of Data Protection Officer**

Data Protection Officer of City of Helsinki

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

09 310 1691 (switchboard)

This privacy notice has been updated on 8.12.2025