



## **Privacy Policy**

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

## **Helsinki Youth Council Elections**

### **Data Controller**

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

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

Organizing Youth Council Elections requires the processing of personal data of candidates, voters and legal guardians. The purpose of the processing is to ensure the municipality's task of supporting youth participation, democracy education and organizing youth elections.

The purpose for processing personal data is to allow:

- Running for office;
- Presentation of candidates via the election compass;
- Implementation of the election compass;
- Conducting the elections and verifying voter eligibility and
- Development of the elections and monitoring of elections.

Running for office in the Youth Council Election and participating in the Council's functions requires legal guardian's consent. For practical reasons contact details are required to communicate with the candidate as well as other information is required for communication. Every eligible voter must have the opportunity to vote, which is why voter information is requested from the Digital and Population Data Services Agency and every eligible voter is assigned a personal voting number.

### **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.

When special categories of personal data related to an individual are processed, such as political opinions expressed in voting machine responses, the legal basis is Article 9(2) paragraph a of the GDPR: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

### **Key legislation**

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)
- Municipalities Act (410/2015) section 26
- In addition to the Municipalities Act, the participation and consultation of children and young people is regulated in Section 8 of the Youth Act (1285/2016).

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

For candidates running for office the following data is processed: candidate's basic information, name, residential area, year of birth, phone number, email address and candidate number. Legal guardian's basic information, name, residential area, year of birth, phone number and email address. After the candidacy has been registered, candidate's information is entered into the election compass: name of the candidate, year of birth, candidate's postal number, photo and campaign poster.

The election is conducted on the basis of contact details of 13- to 17-year-old Helsinki youth received from the Digital and Population Data Services Agency. The information is entered into an authentication system, which gives the voter a personal voting code. The following information is processed in the system: the name of the voter, home address and year of birth.

The election result is stored on a network drive for the duration of the Youth Council's term of office, which is two years. The result includes the following personal data: the candidate's name, postal code, candidate number, and number of votes received.

Providing additional information – such as a photo or justification for the election compass answers – is voluntary and guided by youth workers. A candidate may voluntarily provide data that is relevant to campaign work. All data is retained only for as long as necessary and will be appropriately deleted after the election.

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

Personal data is collected from the candidates and their legal guardians. Candidacy is declared via an electronic Webropol survey form. Information about eligible voters is received from the Digital and Population Data Services Agency as an Excel spreadsheet.

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

The following partners and system providers process the data:

- Meltlake Oy
- Arts&Minds Oy / eVaali.fi
- Webscale Oy / Election Compass
- Election officials (Culture and Leisure Division / Youth services personnel)

## **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?**

Names of the candidates and contact details are retained for a maximum of 5 years following the formation of the Youth Council.

Data in the election compass: names of the candidates, answers and photographs are stored until the election result is confirmed, and for up to 2 months thereafter. Written consents provided by legal guardians are retained for 2 years after the confirmation of the election result.

Responses submitted by users for the election compass, including results and candidate recommendations, are not stored beyond the completion of the compass and the presentation of results. The election compass does not contain technical tracking of its users. The database containing eligible voters' information and voting numbers is destroyed after the election following information security protocol.

Eligible voters' details and voting codes are retained in the authentication system during the election period, in case a voter loses the code assigned to them prior to casting their vote.

## **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: PL 800, 00531 Helsinki

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

Phone switchboard: 029 56 66700

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

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

#### **Contact person**

Participation coordinator Mira Honkaniemi

**Person in charge**

Regional Director of Youth Services (East youth work) Katri Kairimo.

**Contact details**

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

**Contact details of the Data Protection Officer**

Data Protection Officer of the City of Helsinki

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

09 310 1691 (switchboard)

This privacy policy was last updated on 18.9.2025.