

## Privacy notice

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

## The library's Reading Coach Junior service data file

### Controller

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

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

The purpose of the data file is to enable the library's Reading Coach Junior service. With the help of personal data collected in the data file, reading coaches can contact customers who have ordered coaching or their guardians and conduct reading coaching based on the customer's personal reading preferences.

### Legal grounds for processing

The legal basis is Article 6(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)
- Public Libraries Act (1492/2016)

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

Data subject: first name and e-mail address.

In order to ensure the success of reading coaching, information is also collected on reading preferences and on the age group the customer wants the books to be aimed at. The customer may also freely describe their special wishes or, for example, restrictions related to reading.

In the case of the youngest data subjects, the e-mail address often belongs to the guardian.

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

Personal data is obtained directly from the data subject or from their guardian.

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

No data disclosures, including outside the EU or EEA. Anonymous disclosures for statistical purposes.

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

No data disclosures outside the EU or EEA.

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

Personal data is retained until the end of the calendar year during which the reading coaching has been completed.

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

The processing of personal data does not involve automated decision-making and 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**

Pedagogical Information Specialist Piia Bågman

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

Director of Regional Library Services

### **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 12.12.2025.