

## **Data protection policy**

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

## **Development of the City of Helsinki transport system**

### **Controller**

The Urban Environment Committee. The controller's duties have been delegated to the land use director. Urban Environment Committee's decision 15 May 2018 HEL 2018-004277.

Urban Environment Division, Työpajankatu 8, P.O. Box 58210, FI-00099 City of Helsinki

### **How are your personal data processed?**

#### **Purposes of processing**

The purpose of the processing of personal data is the development of the motor vehicle transport, public transport and goods transport system, as well as that of bicycle and pedestrian transport, in the City of Helsinki.

In terms of the 360 street view photography and laser scanning of the public traffic lanes of the city, the purpose of the processing is only to anonymise any personal data recorded in public materials using automatic and manual blurring methods. The personal data included in the material will not be used

for any other purposes. The anonymised photographic and laser scanning material is used in the aforementioned transport system development tasks, and any shortcomings in the anonymisation will be corrected without delay.

The purpose of processing photography carried out for the purpose of traffic censuses is to count the users of various transport methods, such as pedestrians, cyclists, electric scooter users and cars. Data collection is carried out for the general monitoring of transport and various experiments.

### **Legal basis for processing personal data**

Point (b) of Article 6(1) of the EU General Data Protection Regulation: the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Point (c) of Article 6(1) of the EU General Data Protection Regulation: processing is necessary for compliance with a legal obligation to which the controller is subject.

Point (e) of Article 6(1) of the EU General Data Protection Regulation: the 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 (e.g. traffic censuses, 360 street view photography and laser scanning).

### **Relevant legislation**

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

- Act on the Openness of Government Activities (621/1999)
- Road Traffic Act (729/2018)
- Land Use and Building Act (132/1999)
- Land Use and Building Decree (895/1999)

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

For residents of the municipality, we process their name, telephone number, address, email address, age, gender, transport habits, income level, vehicle registration number and vehicle ownership. For consultants, we process their employer information, CV and work history.

The material (e.g. video, photographs) recorded in connection with 360 street view photography, laser scanning and traffic censuses may include various data that can be connected to an individual, such as images of the face and vehicle registration plates.

### **How do we collect personal data?**

We collect personal data from the individuals themselves and systems maintained by authorities.

As far as 360 street view photography and laser scanning material is concerned, material containing personal data on a temporary basis is produced using cameras and laser scanners mounted on photography vehicles moving on public traffic routes in the City of Helsinki.

Traffic census material containing personal data is produced using cameras that are mounted on or near public traffic routes in the City of Helsinki.

### **Whom do we disclose personal data to?**

The data are not statutorily disclosed. The data may, however, have to be disclosed based on a detailed data request in accordance with legislation.

### **Personal data processors**

The City may outsource the processing of your personal data to an external system supplier or service provider based on a separate commission agreement. In this event, personal data are processed by and on behalf of the City, and for the purpose defined by the City. The City remains the controller of your personal data. The City and the service provider are in charge of the pertinence of the processing of your personal data together.

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

The City of Helsinki ensures that your personal data are processed in the EU or the EEA by default. City services or functions can, however, be implemented by using service providers, services and servers located elsewhere in some cases. In this event, your personal data may be transferred outside the EU or the EEA, e.g. to the United States. The General Data Protection Regulation lays down strict criteria for the transfer of personal data to countries whose personal data processing legislation does not meet the requirements in European data protection legislation. In this event, the City of Helsinki commits to adhering to the requirements concerning the sufficient level of protection for personal data, and will engage the system

suppliers and service providers it uses to ensure that corresponding data protection responsibilities in the manner required by data protection legislation are put into place where applicable.

### **How long will your personal data be stored?**

The data will be kept for up to five years.

Personal data contained in the material are only stored temporarily for 360 street view photography and laser scanning, and any personal data are anonymised within 14 days of the photography ending, at the latest.

Traffic census video and photographs are only stored for the duration of the project.

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

No automated decision-making or profiling is used for processing personal data.

### **Your rights in terms of the processing of your personal data**

You can find the information on the rights of data subjects and exercising these rights 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>

### **The right to inspect data (Right of access by the data subject, Article 15)**

You have the right to know which of your personal data is processed and recorded. The City will provide you with the information without undue delay and no later than within one month of the request. If necessary, this deadline can be extended by a maximum of two months, if the request is exceptionally comprehensive and complex. If the deadline is extended, the City will notify the person who submitted the request of the extension and the grounds for the extension within one month of receiving the request.

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

You have the right to demand that the City rectifies any inaccurate and faulty information concerning you without undue delay. You also have the right to have incomplete data supplemented. Any inadequacy of data is assessed taking into account the purposes of the processing of the data in the register. If the City does not approve of the data subject's demand to have their data rectified, it must provide a written report on the matter specifying the reasons for not approving the demand. The City must also provide information on the option to lodge a complaint with the control authority and use other legal remedies.

### **Right to erasure (Article 17)**

In some exceptional cases, e.g. if the processing of data was based on consent from the data subject and the data subject revokes their consent, the

data subject has the right to have their data erased, or 'to be forgotten.' If the City does not approve of the data subject's request to have their data erased, it must provide a written report on the matter specifying the reasons for not approving the request. The City must also provide information on the option to lodge a complaint with the control authority and use other legal remedies. The data subject has no right to have their data erased, if the processing is necessary for compliance with a legal obligation to which the controller is subject or the 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.

### **Right to restriction of processing (Article 18)**

The data subject may have the right to obtain from the controller a restriction of processing their personal data until the controller has verified the accuracy of, rectified or supplemented the personal data. These include situations where the accuracy of the personal data is contested by the data subject, in which event the processing is restricted until the City has verified the data.

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

The data subject has the right to transmit their personal data to another controller if they have provided the controller with their personal data themselves and the processing is based on consent or on a contract and the processing is carried out by automated means. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

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

The data subject has the right to object, on grounds relating to their particular situation, at any time to processing of personal data 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 controller shall no longer process the personal data unless the City is able to demonstrate compelling legitimate grounds for the processing. The processing may also continue if the processing is necessary for the establishment, exercise or defence of legal claims.

## **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 consider that the processing of your personal data infringes the General Data Protection Regulation (EU) 2016/679. In addition to this, you also have the right to employ other administrative appeals and legal remedies.

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

Street address: Lintulahdenkuja 4

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

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

Switchboard: +358 29 56 66700

## **How can you make enquiries about matters relating to data protection?**

### **Person responsible**

Traffic and Street Planning Manager



## **Contact person**

Transport System Unit Manager

360 street view photography: Resource Planning Unit Manager

Traffic censuses: Traffic Management Unit Manager

## **Contact information**

Urban Environment Division, Työpajankatu 8, P.O. Box 58214, FI-00099 City of Helsinki

## **Contact information for the Data Protection Officer**

City of Helsinki Data Protection Officer

tietosuoja@hel.fi

+358 9 310 1691 (switchboard)

This data protection policy was updated on 10 April 2024