Helsinki

Privacy Statement

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

Privacy statement of the City of Helsinki’s register for the family caregivers of the elderly, mental health rehabilitants and people with disabilities

Controller

Social Services, Health Care and Rescue Services Division.

The tasks of the controller have been delegated to the Director of the Social Services, Health Care and Rescue Services Division (decision by the Social Services, Health Care and Rescue Services Division of 18 March 2025, Section 44).

The controller's contact details can be found at the end of this privacy statement.

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

The purpose of the processing of personal data is to organise the family care of the elderly, mental health rehabilitants and people with disabilities, in accordance with the statutory duties of the City of Helsinki.

The personal data required by law is collected from those applying to become family caregivers in order to arrange family care.

Providing the data is a statutory requirement for the performance of family care duties in the City of Helsinki; without the necessary data, the application cannot be completed

The aim of the processing is to assess the suitability and eligibility of the family caregiver for the task and to ensure a safe and high-quality family care for the clients.

The legal bases for processing personal data are as follows:

Article 6(1)(c) of the EU General Data Protection Regulation (EU 2016/679), because the processing is necessary in order to comply with the controller's legal obligation.

Section 6(2) of the Data Protection Act (1050/2018) and Article 9(2)(h) of the General Data Protection Regulation, as the processing is necessary for the organisation and implementation of health care and social welfare services.

If the data subject provides other special personal data (e.g. information about their health, beliefs or ethnic origin) on their own initiative, the processing is based on the data subject's consent (Article 9(2)(a) of the GDPR).

The processing of personal data is based on the following legislation:

- Family Care Act (263/2015)
- Social Welfare Act (1301/2014)
- Act on Special Care for Persons with Intellectual Disabilities (519/1977)
- Disability Services Act (675/2023)
- Act on the Processing of Client Data in Healthcare and Social Welfare (703/2023)
- Act on the Supervision of Healthcare and Social Welfare Services (741/2023)
- Act on Organising Healthcare and Social Welfare Services (612/2021)
- Act on the Openness of Government Activities (621/1999)
- Act on Checking the Criminal Background of Persons Working with Children (504/2002)

Which personal data do we process about you?

Only personal data necessary for the arrangement of family care, training, assessment and monitoring is processed in the register.

The data we process may include:

- the person's basic information (name, personal identity number, address, contact details, education, profession, e-mail address and bank account number)
- the names and years of birth of the partner and minor children
- information about an order of non-disclosure for personal safety reasons or secret address
- information on family caregiver training, suitability assessment and cooperation with the City
- information about the family care home and its surroundings that is relevant for assessing the safety and quality of family care
- confidentiality agreement
- information on substance abuse, mental health or child welfare client relationships, if relevant for assessing suitability as a family caregiver
- entry of checking the criminal record extract
- form of family care
- personal data of placed clients included in family care commission agreements
- information on the placed client in the commission agreement
- information on support measures, training and supervision of family caregivers

In addition, the register may process data belonging to special categories of personal data, such as:

- information on health, if necessary for the assessment of suitability
- information provided by the person about conviction, life situation or other factors that may affect the quality and safety of family care
- Personal data is processed only to the extent necessary for the arrangement, supervision and support of family care.

Where do we collect your personal data from?

Personal data is primarily obtained from the data subjects themselves in connection with the family care application, training, assessment and supervision of family care.

In addition, data may be collected from the following sources on legal grounds:

social welfare and health care services of the City of Helsinki or the wellbeing services county, such as suitability statements (so-called home municipality statement)

- entries based on employees' professional observations and discussions during the application and evaluation process

Criminal register extract obtained from the Legal Register Centre, in accordance with the Act on Checking the Criminal Background of Persons Working with Children (504/2002):

- reports and documents provided by various authorities or service providers that are necessary for assessing the suitability of a family caregiver

- possible notifications of observed deficiencies in family care and information obtained in connection with their investigation

All data is collected and processed in accordance with data protection legislation and only to the extent necessary for the arrangement and supervision of family care.

To whom do we disclose or transfer your personal data?

Personal data is only disclosed in situations permitted and required by law.
The data may be disclosed to:

- other authorities or wellbeing services counties, if it is necessary for the arrangement or supervision of family care or the performance of a statutory duty
- supervisory authorities, such as the Regional State Administrative Agency or Valvira, if this is necessary for the performance of the supervisory tasks provided for by law
- the Legal Register Centre, if there is a need to check the data under the Act on Checking the Criminal Background of Persons Working with Children (504/2002)

- the City’s internal division, if the processing of data is necessary to fulfil the administrative or financial obligations of family care

The City of Helsinki may use external service providers, such as information system providers or providers of training services, to process personal data.

In this case, the service providers in question act as processors of personal data on behalf of the City and undertake to comply with the processing agreement concluded with the City, in accordance with Article 28 of the General Data Protection Regulation.
Personal data is not disclosed for marketing or other commercial purposes.

Is your personal data transferred outside the EU or EEA?

The City of Helsinki mainly processes personal data in the EU and EEA.

However, in some cases, the information systems or service providers used by the City may also be located or process data outside the EU or EEA; for example, when international cloud services are used.

In this case, personal data is only transferred if there is a legal basis for the transfer, in accordance with the General Data Protection Regulation (EU 2016/679).

The City ensures an adequate protection of the personal data.

- This means that the transfers comply with the requirements of the GDPR, such as:
- Standard Contractual Clauses approved by the European Commission,
- adequacy decisions by the European Commission, or
- other safeguards referred to in Article 46 of the Regulation.

The City commits all the service providers it uses to comply with the same data protection obligations that apply in the EU and EEA.

How long do we store your personal data?

Personal data will only be stored for as long as it is necessary for the arrangement and supervision of family care and meeting of archiving obligations.
The data retention periods are determined in accordance with the Archives Act (831/1994), the Act on the Processing of Client Data in Healthcare and Social Welfare (703/2023) and the City of Helsinki's information management plan.

The retention periods for family care documents are as follows:

- family care agreements, documents concerning the families' background and circumstances as well as statements and decisions concerning family caregivers are stored for ten (10) years after the end of serving as a family caregiver
- rejected family care applications and their appendices are stored for five (5) years from the date of the decision

When the data is no longer needed for the original purpose, it is deleted, anonymised or transferred for archiving to the City's permanent storage, if required by the archiving obligation.

Automated decision-making and profiling

The personal data in the register is not used for automated decision-making or profiling.
All processing of personal data is based on the statutory processes of family care, and all decisions are made based on expert assessment and the official's discretion.
Any decisions regarding approval, rejection or supervision as a family caregiver involve an assessment and decision by a human.

Your rights in relation to the processing of your personal data

You have the rights laid down in the EU General Data Protection Regulation regarding the processing of your personal data. These rights include:

- Right to access your data (Article 15) - you may request to know what personal data about you is processed and receive a copy of it.
- Right to rectification (Article 16) - you may request the rectification of your inaccurate or incomplete data.
- Right to erasure (Article 17) - you may request the erasure of your data in certain situations, if there is no other legal basis for the processing.
- Right to restriction of processing (Article 18) - under certain conditions, you may request that the processing of your data be suspended, for example, for the duration of checking the accuracy of the data.
- Right to data portability from one system to another (Article 20) - this right only applies to data that you yourself have provided and the processing of which is based on consent or contract and is carried out automatically.
- Right to object (Article 21) - on grounds relating to your particular situation, you may object to the processing of your data when the processing is based on the performance of a task carried out in the public interest or in the exercise of official authority.
- Right to withdraw consent (Article 7) - if the processing is based on consent, you may withdraw it at any time.
- Right to lodge a complaint with a supervisory authority (Article 77) - if you believe that your personal data has been processed unlawfully, you may lodge a complaint with the Data Protection Ombudsman.

More information on your rights and how to exercise them can be found on the City's website:

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 the City of Helsinki processes about you in the register of family caregivers of the elderly, mental health rehabilitants and people with disabilities, and the right to receive a copy.

- The City shall provide the information without undue delay, at the latest within one month of receipt of the request.
- The time limit may be extended by a maximum of two months, if the request is exceptionally extensive and complex.
- If the time limit is extended, the City shall inform you within one month of receiving the request and give the reasons for the delay.
- If the City refuses to comply with your request for inspection, it will inform you of this in writing within one month of receiving the request.
- The decision shall state the reasons for the refusal, unless their disclosure jeopardises the purpose of the refusal.
- At the same time, you will be informed of the possibility to lodge a complaint with the Data Protection Ombudsman's Office and the use of other legal remedies.

Instructions for submitting a request to inspect data can be found on the City's website: Rights of data subjects and exercising these rights - https://www.hel.fi/en

Right to rectification (Article 16)

You have the right to demand that the City correct inaccurate and incomplete personal data concerning you without undue delay.

You also have the right to request to complete your data, if it is relevant for the arrangement of family care and the incomplete data might affect decisions or assessments.

If the City does not accept your request for rectification, it will give you a written decision stating the reasons why your request has not been accepted.

At the same time, you will be informed of the possibility to lodge a complaint with the Data Protection Ombudsman's Office and the use of other legal remedies.

Instructions for submitting a request for rectification can be found on the City of Helsinki's website: The data subject's rights and instructions for exercising them - https://www.hel.fi/en

Right to be forgotten (Article 17)

You have the right to request that the City of Helsinki deletes the personal data concerning you if one of the following grounds is met:

- you have withdrawn your consent 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 reasons relating to your personal situation and there is no legitimate reason for continuing the processing
- your personal data has been processed unlawfully
- your personal data must be deleted to comply with a statutory obligation under European Union or Finnish legislation
- your personal data has been collected in connection with information society services and it concerns the personal data of a minor

If the city does not accept your deletion request, it will give you a written decision stating the reasons why the data has not been deleted.

At the same time, you will be informed of the possibility to lodge a complaint with the Data Protection Ombudsman's Office and the use of other legal remedies.

However, the right to deletion does not apply, if the processing is necessary:

- for compliance with a statutory obligation of the City of Helsinki
- for the performance of a task carried out in the public interest or
- for the exercise of official authority vested in the City

Right to restriction of processing (Article 18)

In certain situations, you have the right to request that the City of Helsinki restricts the processing of your personal data.

The processing may be restricted in the following situations, for example:

- you dispute the accuracy of your data, in which case the processing will be restricted for the time the City checks the accuracy of the data
- the processing is unlawful, but you do not want your data to be deleted, only restrict its processing

- the City no longer needs the information for the original purpose, but you need it to establish, exercise or defend a legal claim
- you have objected to the processing of your data and we are waiting for a statement on whether the City's legitimate interests override your interests
- When the processing of personal data is restricted, the data may be retained, but it may only be processed with your consent or in connection with a legal claim.

Instructions for submitting a request for restriction of processing can be found on the City of Helsinki's website: The data subject's rights and instructions for exercising them – https://www.hel.fi/en

Right to data portability (Article 20)

You have the right to have the personal data provided by you transferred from one controller to another, if the following conditions are met:

- you have provided the information to the City of Helsinki yourself
- the processing is based on your consent or a contract,
- and the processing is performed automatically

This right means that you may request your data in a structured, commonly used and machine-readable format and, if you wish, transfer it to another controller, if this is technically possible.

The right to data portability does not apply to the processing of personal data that is necessary

- for the performance of a task carried out in the public interest, or
- for the exercise of official authority vested in the City.

Instructions for submitting a data transfer request can be found on the City of Helsinki's website:

The data subject's rights and instructions for exercising them – https://www.hel.fi/en

Right to object (Article 21)

You have the right to object to the processing of your personal data at any time on the basis of your personal, special situation, when the processing is based on:

- the controller's legitimate interest,

- the performance of a task carried out in the public interest, or
- for the exercise of official authority vested in the City.

If you exercise your right to object, the City of Helsinki may continue to process your personal data only if it can demonstrate compelling legitimate grounds for the processing that override your interests, rights or freedoms.

The processing may also continue if the processing is necessary for the establishment, exercise or defence of a legal claim.

Right to withdraw consent (Article 7)

If the legal basis for the processing of your data is consent, you have the right to withdraw your consent at any time.

When requesting consent, the City will inform you of how and where you can withdraw your consent.

The withdrawal of consent does not affect the lawfulness of the processing based on consent that took place before the withdrawal.

After the withdrawal of consent, your personal data will no longer be processed for the purpose for which the consent was originally given.

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

You have the right to lodge a complaint with the Data Protection Ombudsman's Office if you consider that the processing of your personal data violates the EU General Data Protection Regulation (EU) 2016/679.

Office of the Data Protection Ombudsman
Visiting address: Lintulahdenkuja 4
Postal address: P.O. Box 800, 00531 Helsinki, Finland
Email: tietosuoja@om.fi
Switchboard: 029 56 66700

How can you contact us with questions about data protection?

Contact person

Aino Jussila, Manager of Services for People with Disabilities, aino.jussila@hel.fi, tel. 09 310 43155 (people with disabilities)
Eeva Tamminen, Specialist, eeva.tamminen@hel.fi, tel. 09 310 58595 (the elderly)
Satu Tuomainen, Assessment Manager, satu.tuomainen@hel.fi, tel. 050 4020153 (mental health rehabilitants)

Person in charge

Sanna Rautalammi, Director of Services for People with Disabilities,
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Tel. 09 310 43149
Soili Partanen, Director of Assessment Operations, soili.partanen@hel.fi, tel.
09 310 69984
Mikko Tamminen, Director of Housing, Crisis and Substance Abuse Services,
mikko.tamminen@hel.fi,
Tel. 09 310 79622

Contact information

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Sosiaali- ja terveystoimiala
Kirjaamo PL 10 (Pohjoisesplanadi 11–13)
00099 Helsingin kaupunki
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Telephone: 09 310 1641 (switchboard)

Contact details of the data protection officer

City of Helsinki Data Protection Officer

tietosuoja@hel.fi

09 310 1691 (switchboard)

This privacy statement was updated on 2 September 2026