

Information provided under Articles 12–14 of the
EU General Data Protection Regulation (2016/679)
Privacy notice updated 11.10.2019

1. Register name	The order register of the Borrow a Librarian service
2. Data controller	City of Espoo P.O. Box 1, 02070 City of Espoo
3. Person responsible for the register	Ellen Karhulampi, Library Services Manager Tapiola Library, Kulttuurikeskus, Kulttuuriaukio 2, 02100 Espoo
	tel. +358 43 824 9265; email: ellen.karhulampi@espoo.fi
4. Contact person of the register	Reeta Voutilainen, Chief Library Pedagogue Iso Omena Library, Suomenlahdentie 1, 02230 Espoo
	tel. +358 43 827 0986; email: reeta.voutilainen@espoo.fi
5. Data Protection Officer appointed by the organisation	Juho Nurmi Data Protection Officer
	P.O. Box 12, 02070 City of Espoo tel. 043 827 3077; email: tietosuoja@espoo.fi
6. Purposes for processing personal data and the legal basis of processing	<p>The system enables the clients of Espoo City Library to place orders for private IT and other guidance appointments by email. The system is also used for forwarding the orders to the libraries in question. The orders do not form a permanent client register. Instead, the information associated with each order is deleted from the register after an appointment has been scheduled between the client and a suitable guide, or within three months of this date at the latest.</p> <p>Personal data will not be used for statistical purposes or for analysing the responses. Espoo City Library may compile statistics of the guidance appointments it provides without including any personal data.</p> <p>Legal grounds for processing personal data: Article 6(1)(c) of the General Data Protection Regulation of the European Union and section 6 of the Public Libraries Act.</p>

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<p>7. Contents of the register (description of the categories of data subjects and the categories of personal data)</p>	<p>The web form requires the client's name and telephone number to enable the library to contact them. The client may voluntarily enter their email address to facilitate communication.</p> <p>When it comes to the guidance appointment that the client requests, the client must specify a library where the appointment should take place, its time and a more detailed description of their need for guidance, part of which can be written freely.</p>
<p>8. Sources of personal data</p>	<p>Personal data is collected from clients themselves. The client's name, telephone number and the requested library are the only mandatory fields in the web form.</p>
<p>9. Recipients or categories of recipients of the personal data</p>	<p>The client requests a library as the location of their guidance appointment. Based on this information, the client's order is automatically forwarded to the email address of the library in question. The orders are usually sent to the official email address of the library and the personal email address of the person in charge of guidance appointments in that library.</p> <p>The technical service behind the web form is provided by Webropol oy. The technical service behind the email service is provided by Microsoft.</p>
<p>10. Transfer of data outside the EU or the EEA</p>	<p>The technical service provider of the web form, Webropol Oy, will not transfer data contained within the system outside the EU or the EEA.</p> <p>The email messages handled by the email service provided by Microsoft are stored within the EU. Microsoft operates and develops Office 365 from locations outside Europe, and data is considered to be transferred outside the EU for example in a situation where an administrator establishes a remote connection from the United States to a data centre in Europe, for example to solve a technical problem. In such circumstances, standard contractual clauses of the European Union and the principles of the EU-U.S. Privacy Shield Framework apply.</p>
<p>11. Data storage periods</p>	<p>Personal data does not need to be stored after the requested guidance session has been scheduled between the guide and the client. In practice, old orders accumulated in the register are deleted every three months at the latest.</p>
<p>12. Register maintenance systems and principles of protection</p>	<p>Data processing is regulated by the General Data Protection Regulation (e.g. the principles of purpose limitation, necessity and accuracy). Personal data is processed in a manner that ensures appropriate security of the personal data, including protection (Article 5(1)(f) of the General Data Protection Regulation). Personal data is protected against unauthorised access and unlawful processing, such as loss, alteration or disclosure. Each employee can only process the data they need to conduct their work. Each employee who processes data are under an obligation of secrecy and confidentiality, which remains in force even after the employee's employment relationship has ended.</p>

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	<p>A. ELECTRONIC MAINTENANCE SYSTEMS: The library grants user rights to the administrators of the web form on a task-specific basis, and the administrators must sign an end user license agreement and a non-disclosure agreement.</p> <p>B. MANUAL MATERIALS: In practice, no manual materials exist. Potential printouts will not be stored.</p>
<p>13. Right of access to data</p>	<p>The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.</p> <p>The controller shall provide information without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.</p> <p>If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.</p> <p>All information and actions taken on the grounds of a data subject's right of access request, any information provided under Articles 13 and 14 of the GDPR and any communication and any actions taken under Articles 15 to 22 and 34 shall be provided free of charge.</p> <p>Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either:</p> <ol style="list-style-type: none"> a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or b) refuse to act on the request. The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request. <p>How to submit a request of access:</p> <ul style="list-style-type: none"> • By post to the contact person of the register or

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	<ul style="list-style-type: none"> by visiting a Service Point or the Registry Office in person and proving one's identity there. <p>Link: request of access form</p>
14. Right to rectify data	<p>The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.</p> <p>The data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Whether the data is incomplete will be determined in the light of the purpose for which the data in the register is processed.</p> <p>If the controller refuses the request of a data subject of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal and inform the data subject of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.</p> <p>How to submit a request for rectification</p> <ul style="list-style-type: none"> By post to the contact person of the register or by visiting a Service Point or the Registry Office in person and proving one's identity there. <p>Link: request for rectification form</p>
15. Right to lodge a complaint	<p>Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation. This right is laid down in Article 77 the General Data Protection Regulation (GDPR, 2016/679).</p>
16. Other potential rights	<p>Requests should be made to the contact person of the register.</p> <p>Right to erasure (Article 17 of the GDPR)</p> <p>The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay where one of the grounds laid down in Article 17(1) applies. The data subject does not have the right to erasure for example if the processing of data is necessary for compliance with a legal obligation or for the</p>

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	<p>performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> <p>Right to restriction of processing (Article 18 of the GDPR)</p> <p>The data subject shall have the right to obtain from the controller restriction of processing where one of the requirements laid down in Article 18(1)(a–d) applies.</p> <p>Right to object (Article 21 of the GDPR)</p> <p>The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, which is processed 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 controller demonstrates compelling legitimate grounds for the processing.</p> <p>Right to data portability (Article 20 of the GDPR)</p> <p>The data subject shall have the right to have his or her data transmitted only if the processing of data is based on consent or on a contract, and if the processing is carried out by automated means. The data subject's right to data portability does 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.</p> <p>If the processing of data is based on consent, the data subject shall have the right to withdraw his or her consent at any time.</p>
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