

Date: 13 March 2019

## Privacy notice, City of Espoo

|  |  |
|--|--|
| 1. Register name   | The feedback and customer satisfaction register of Espoo Customer Service and the Service Centres of the City of Espoo.  |
| 2. Data controller   | City of Espoo  |
| 3. Person responsible for the register                                       | Kirsi Remes, Customer Service Director   |
|  | firstname.lastname@espoo.fi  |
| 4. Contact person of the register  | Espoo Customer Service   |
|  | info@espoo.fi  |
| 5. Data Protection Officer appointed by the organisation                     | Juho Nurmi, Data Protection Officer  |
|  | tietosuoja@espoo.fi  |
| 6. Purposes for processing personal data and the legal grounds of processing | <p>The personal data stored in this register will be processed for the purposes of feedback collection and service development:</p> <ul style="list-style-type: none"> <li>questionnaires, surveys, compilation of statistics, analyses.</li> </ul> <p><b>Legal grounds of processing:</b></p> <p>Article 6(1)(a) of the General Data Protection Regulation of the European Union: the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> <p>Article 6(1)(b) of the General Data Protection Regulation of the European Union: 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</p> <p>Article 6(1)(c) of the General Data Protection Regulation of the European Union: processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p><b>Key legislation:</b><br/>         General Data Protection Regulation of the European Union (679/2016)<br/>         Data Protection Act (1050/2018)<br/>         Local Government Act (410/2015)<br/>         Act on the Openness of Government Activities (621/1999)</p> |
| 7. Contents of the register  | Contact information to the extent that is necessary for the organisation of prize draws (email or telephone number). The required background information (age, profession, family situation, gender, mother tongue, the role in which the person uses the service in question).  |

Date: 13 March 2019

|  |   |
|--|---|
|  | <p>Clients may submit feedback for example as free-form text or in numerical form (rating scales or multiple choice questions). The client feedback contains information about the realisation of the service.</p> <p>Clients take surveys and provide feedback anonymously, but should a client wish to participate in a prize draw, they need to provide their email address or telephone number. Such contact information cannot be linked to the survey responses, and the contact information will be deleted immediately after the prize draw.</p>  |
| 8. Sources of personal data  | The customer provides this information while taking a survey or giving feedback.  |
| 9. Disclosure of data  | Data will not be disclosed to parties external to the City of Espoo. The data will only be processed by Espoo Customer Service.   |
| 10. Transfer of data outside the EU or the EEA   | This data will not be transferred outside the EU or the EEA.  |
| 11. Data storage periods   | If contact information has been collected, it will be immediately deleted after the prize draw. Individual survey responses will be deleted within a year.  |
| 12. Register maintenance systems and principles of protection  | <p>A survey tool provided by a contracted supplier of the City of Espoo.</p> <p>Access to the data is limited to certain Customer Service employees appointed for this task. User rights are given on a task-specific basis. Each user must accept a data and data system user agreement and non-disclosure agreement. The users regularly participate in data protection and data security trainings.</p>  |
| <p><b>Instructions on submitting information requests referred to in the General Data Protection Regulation to the City of Espoo:</b><br/> <a href="https://www.espoo.fi/en-US/Eservices/Data_protection/Client_rights">https://www.espoo.fi/en-US/Eservices/Data_protection/Client_rights</a></p> |   |
| 13. Right of access to data  | <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> |

Date: 13 March 2019

|                                |  |
|--------------------------------|--|
|                                | <p>Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either:</p> <p>charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or</p> <p>refuse to act on the request. The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.</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>                                     |
| 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>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 17 Article 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 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> |

Date: 13 March 2019

|  |  |
|--|--|
|  | <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>Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.</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> |
|--|--|