

Date: 24 September 2019

Description of personal data register, City of Espoo

1. Register name	Registration to co-create with learning environments of the City of Espoo.
2. Data controller	City of Espoo
3. Person responsible for the register	Harri Luttinen, Chief Digital Officer
	City of Espoo, Education and Cultural Services / PB 30 02070 City of Espoo harri.luttinen@espoo.fi
4. Contact person of the register	Minna Kukkonen, Planner
	City of Espoo, Education and Cultural Services/ PB 3291 02070 City of Espoo minna.a.kukkonen@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>Espoo has opened its schools and other learning environments for co-creation. The co-creation is based on the "KYKY" model. At the moment, the processes and models of co-creation are developed within the Smart Learning Environments for the Future project and the Developing KYKY project together with companies, RDI-organisations and the representatives of the city's leaning environments.</p> <p>Personal data is processed in order to enable the co-creation. The city may also process data in order to form anonymous data for statistical purposes.</p> <p>Legal grounds of processing:</p> <p>Article 6(1)(e) of the General Data Protection Regulation of the European Union: 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</p>
7. Contents of the register	<p>Description of the personal data collected in the register:</p> <ul style="list-style-type: none"> - Representative of a company/community: name, e-mail and phone number - Contact person of the city: name, e-mail and phone number

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8. Sources of personal data	The personal data is collected from the data subjects. Participation to co-create, i.e. giving the information, is voluntary.
9. Disclosure of data	The technical service provider of the registration form is Webropol Oy. Microsoft Office tools may also be used to process the data. Webropol and Microsoft produce the services on behalf of Espoo.
10. Transfer of data outside the EU or the EEA	<p>All the data which is contained in the Webropol service is stored inside the EU and is not transferred or processed outside the EU.</p> <p>The contents of the services Microsoft provides is stored within the EU. Microsoft operates and develops its Office 365 services from outside of Europe and the data is regarded to transfer outside the EU if for example the administrator is given remote access to a European server room for example to clear up a fault situation. In this case the Commission's standard contractual clauses and the EU U.S. Privacy Shield terms are applied.</p>
11. Data storage periods	The data is stored at most one year from when the city has received the data.
12. Register maintenance systems and principles of protection	<p>A. ELECTRONIC MAINTENANCE SYSTEMS: - Webropol and Microsoft</p> <p>B. MANUAL MATERIALS: - None</p> <p>PRINCIPLES OF DATA PROTECTION:</p> <p>A. Electronic materials IT equipment is located in protected and supervised premises. Each user has personal user rights to client data systems and files. User rights are given on a task-specific basis. Each user must accept a data and data system user agreement and non-disclosure agreement.</p>
Instructions on submitting information requests referred to in the General Data Protection Regulation to the City of Espoo: https://www.espoo.fi/en-US/Eservices/Data_protection/Client_rights	
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>

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	<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> <p>charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or refuse to act on the request. The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.</p>
<p>14. Right to rectify data</p>	<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>15. Right to lodge a complaint</p>	<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>
<p>16. Other potential rights</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 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>

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	<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>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>
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