

Approved by the General Data Protection Regulation (GDPR) implementation project on 6 February 2018  
Privacy notice updated 24.4.2019

## Privacy notice, City of Espoo

1. Register name	Finnish and Swedish Early Childhood Education units' client register (early childhood education)
2. Data controller	City of Espoo P.O. Box 1, 02070 City of Espoo
3. Person responsible for the register	Virpi Mattila, Director of Finnish Early Childhood Education Barbro Högström, Director of Swedish Education and Cultural Services
	virpi.mattila(at)espoo.fi P.O. Box 302, 02070 City of Espoo tel. 09 816 23300  barbro.hogstrom(at)espoo.fi PB 32, 02070 Esbo stad tel. 09 816 52340
4. Contact person of the register	Miia Latvala System Coordinator
	miia.latvala(at)espoo.fi P.O. Box 30, 02070 City of Espoo tel. 043 827 3209
5. Data Protection Officer appointed by the organisation	Juho Nurmi Data Protection Officer
	Tietosuoja(at)espoo.fi P.O. Box 12, 02070 City of Espoo tel. 043 827 3077
6. Purposes for processing personal data and the legal basis of processing	<p>The personal data stored in this register is processed for the purposes of organising early childhood education and taking care of tasks that arise from the early childhood education provider's relationship with the child (section 5 of the Act on Early Childhood Education and Care)</p> <ul style="list-style-type: none"> <li>· Statutory information regarding the number of children is reported on the basis of this register (Act on Central Government Transfers to Local Government for Basic Public Services)</li> <li>· The register is used for compiling statistics for the City of Espoo. When statistics are compiled, the data is processed anonymously.</li> </ul> <p>Personal data is processed on the grounds of:</p> <ul style="list-style-type: none"> <li>· Article 6(1)(c) of the General Data Protection Regulation of the European Union (2016/679)</li> <li>· Act on Early Childhood Education and Care (540/2018)</li> <li>· Government Decree on Early Childhood Education and Care (753/2018)</li> </ul>

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	<ul style="list-style-type: none"> <li>· Act on Client Fees in Early Childhood Education and Care (1503/2016)</li> </ul>
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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 information system, event calendar and forms used by Espoo's Early Childhood Education:</p> <ul style="list-style-type: none"> <li>· The child's name, personal identity code, contact information, mother tongue</li> <li>· Custodians' names, personal identity codes and contact information</li> <li>· The information of other persons living in a shared household with the child</li> <li>· The need for services</li> <li>· Application information</li> <li>· Decision on early childhood education and decision on a place in early childhood education</li> <li>· Information on the early childhood education provider and the needs for services</li> <li>· Entries mentioning acceptance of the early childhood education place and discontinued early childhood education</li> <li>· Agreement on the hours of the child's early childhood education</li> <li>· The child's early childhood education plan</li> <li>· The health information needed for the organisation of early childhood education</li> <li>· Decision on transport</li> <li>· Information on the child's day-to-day attendance and absences</li> <li>· Early childhood education support measures</li> <li>· Early childhood education employees' observations on the child's development as entered on an observation form</li> <li>· Information on client fees</li> <li>· Other information needed for the provision of early childhood education</li> </ul>
<p>8. Sources of personal data</p>	<ul style="list-style-type: none"> <li>· The child's custodians</li> <li>· Early childhood education employees</li> <li>· Client information is updated from the Finnish Population Information System through the KAR (municipal resident register) application</li> <li>· A former early childhood education provider may hand over public information which is necessary for the organisation of a child's early childhood education (section 16(3) of the Act on the Openness of Government Activities).</li> <li>· Notwithstanding provisions on confidentiality, a former early childhood provider must immediately hand over information which is necessary for the organisation of a child's early childhood education (section 41(3) of the Act on Early Childhood Education and Care)</li> <li>· Notwithstanding provisions on confidentiality, education officials, social and health care officials, other early childhood education, social and health care providers and social and health care professionals may hand</li> </ul>

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	<p>over information which is necessary for the organisation of a child's early childhood education (section 41(1) of the Act on Early Childhood Education and Care).</p>
<p>9. Disclosure of personal data</p>	<p>Access may be granted to a personal data register controlled by an authority, on the grounds of section 16(3) of the Act on the Openness of Government Activities, if the person requesting access has the right to record and use such data. Personal data can only be disclosed following a specified request for data (section 13(2) of the Act on the Openness of Government Activities).</p> <p>Confidential information may only be disclosed with the written consent of the guardian, or on the grounds of a provision of an act that authorises its disclosure (section 41 of the Act on Early Childhood Education and Care, section 41(4) of the Basic Education Act, section 20 of the Act on the Status and Rights of Social Welfare Clients, section 11 of the Act on the Openness of Government Activities).</p> <p>Some data that is stored in the early childhood education customer information system is transferred to Community, an invoicing system used to invoice early childhood education clients.</p> <p>For the purpose of statistics, a set of data put together in the Efficca system concerning ongoing placements, decisions on fees, the related rows, needs for special support, support measures, applications, persons, families, journal entries, unit information and employee attendance is transferred to a data warehouse server on the 15th day of each month.</p> <p>In addition, a set of data put together in the Efficca system concerning ongoing placements, needs for special support, support measures, persons, applications and unit information is transferred to a data warehouse server every Monday.</p> <p>The city of Espoo may use service providers to organize the service. The service providers process personal data on behalf of the city of Espoo and according to the city's instructions when it is necessary for the organization of the service.</p>
<p>10. Transfer of data outside the EU or the EEA</p>	<p>Data is not transferred outside the EU or the EEA.</p>
<p>11. Data storage periods</p>	<p>Data is stored and destroyed in line with the records management plan of Espoo's Finnish and Swedish Early Childhood Education units and the up-to-date versions of provisions and orders issued by the National Archives of Finland.</p>
<p>12. Register maintenance systems and</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</p>

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<p>principles of protection</p>	<p>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> <p>Electronic maintenance systems:</p> <p>Electronic documents are stored in the early childhood education customer information system Effica. As a protective measure, Effica's users only have the right to access the data they need to perform their duties. The early childhood education customer information system can only be used through the "S network", an internal network only accessible by some City of Espoo employees. Personal data can also be stored in another secure location used by the city when it is necessary for organising early childhood education. All users of this network accept an end user license agreement that for example includes a confidentiality agreement. The server is located in a protected, supervised space (in the service provider's data centre). Communications between the server and workstations are encrypted and protected with firewalls and user credentials.</p> <p>The information connected to an appointment in the event calendar (name, email, telephone number) can only be accessed with the user credentials of the unit in question.</p> <p>Manual materials:</p> <p>Manual materials are stored in locked premises and destroyed by shredding or by being disposed of in confidential waste bins.</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"> <li>a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or</li> <li>b) refuse to act on the request. The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.</li> </ol> <p>How to submit a request of access:</p> <ul style="list-style-type: none"> <li>• send it by post to the manager of the early childhood education unit or</li> <li>• bring it to a <u>Service Point</u> or the <u>Registry Office</u> where your identity will be verified.</li> </ul> <p>Link: <a href="#">Request of access form (in Finnish)</a></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>How to submit a request for rectification</p> <ul style="list-style-type: none"> <li>• send it by post to the manager of the early childhood education unit or</li> <li>• bring it to a <u>Service Point</u> or the <u>Registry Office</u> where your identity will be verified.</li> </ul> <p>Link: <a href="#">Request for rectification form (in Finnish)</a></p>

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<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>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 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>