

1. Name of the register	HobiHobi.fi website's customer feedback register
2. Controller	Name Leisure Committee
	Address City of Vantaa / Education Department P.O. Box 1500, FI-01030 City of Vantaa
	Other contact details (e.g. phone number during office hours, email address) Switchboard +358 (0)9 839 11
3. Responsible person	Responsible person Leena Rusanen
4. Contact person in matters related to the register	Name Leena Rusanen, Sports Manager
	Address Silkkitehtaantie 5 C, FI-01300 Vantaa
	Other contact details (e.g. phone number during office hours, email address) leena.rusanen@vantaa.fi tel. +358 (0)50 314 5702
5. Data protection officer	Name Mikael Valtomaa, Lawyer
	Address Asematie 7, FI-01300 Vantaa
	Other contact details (e.g. phone number during office hours, email address) mikael.valtomaa@vantaa.fi, tel. +358 (0)40 071 3358
6. Subject-matter of the processed personal data	The register contains data (name and contact details) provided by the user.
7. Purpose and legal basis of the processing	The City of Vantaa processes the data in the register to respond to feedback on the service offered on the HobiHobi.fi website as well as to take care of tasks related to the service. The processing of personal data is based on the data subject's consent (point (a) of Article 6(1) of the EU General Data Protection Regulation).
8. Data content of the register (types of personal data)	Personal data contained in the register: <ul style="list-style-type: none"> - name - contact details
9. Categories of personal data	The register includes data only from the regular categories of personal data.
10. Regular sources of data	Data are received from the data subject.

Kommentoinut [SH1]:

11. Disclosures of the data	Data are not disclosed.
12. Transfer of data outside the EU or EEA	The controller uses processors of personal data. The processors can transfer data in the register outside the EU or EEA only if the transfer fulfils the requirements imposed on it by the law and if the transfer and appropriate safeguards have been agreed on in an agreement between the controller and processor.
13. Storage period of the personal data	Data that are necessary to organise the service are stored only for as long as required by the law. Data are primarily destroyed after the customer feedback has been processed.
14. Automated decision-making related to the processing of personal data, incl. profiling	There is no automated decision-making or profiling included in the processing of personal data.
15. Principles of protecting the register	<p>The register's data security as well as the confidentiality, integrity and availability of the personal data are ensured with appropriate technical and organisational measures. The data of an individual person can only be processed by those persons who need the data to take care of their work tasks or official duties and only to the extent required by the work task. In addition, the employees and officials have a statutory obligation of secrecy and confidentiality that continues even after the employment and service has ended (Section 22–23 of the Finnish Act on the Openness of Government Activities). If a third party processes personal data in the register on the controller's behalf, the controller is responsible to ensure that appropriate safeguards and obligation of secrecy have been agreed on in the agreement made with the processor.</p> <p>The devices and software of the City of Vantaa are protected technically. The employees who use the systems have user rights that have been defined based on their work tasks as well as personal user IDs and changing passwords. The use of the systems can be monitored with user log data.</p>
16. Implementing the rights of a data subject	<p><i>The processing period</i></p> <p>The controller shall provide the data subject with information on action taken on a request by the data subject 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. Where the data subject makes the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.</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><i>Fees</i></p>

	<p>Information and any actions related to the implementation of the data subject's rights are free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either:</p> <ul 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. <p>The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.</p> <p><i>Confirming the identity of a natural person</i> Without prejudice to Article 11 ("Processing which does not require identification"), where the controller has reasonable doubts concerning the identity of the natural person making the request, the controller may request the provision of additional information necessary to confirm the identity of the data subject.</p> <p><i>Other things to consider</i> A data subject's rights on behalf of a child can be used by the child's guardian or other legal representative. Guardianship or basis for representation as well as the right to access the data must be ascertained where necessary. A person under the age of 18 can forbid the disclosure of their data to their guardians if the person is able to decide on matters concerning themselves. The person will also be informed of a data request made by a guardian or another person before the request is fulfilled.</p> <p>A caretaker may control their principal's information if the use of an inspection right is included in the proxy or order given to the caretaker. The caretaker shall present the proxy or a decision by a court or magistrate as they request to see the information.</p>
<p>17. Right of access to personal data</p>	<p>A data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning them are processed, and, where that is the case, access to the personal data. If data are processed, a copy of the personal data undergoing processing must be provided for the data subject. The request to access the data is done with a separate form, which can be obtained from Vantaa Info. The form must be signed and returned to Vantaa Info personally. The identity of the person requesting access is verified from a picture ID as the data subject presents the request. The right of access to personal data is verified before the data are disclosed. The controller shall provide the 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.</p>
<p>18. Right to rectification</p>	<p>The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them. The data subject shall also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. The request is free of charge. The request shall be delivered to the City of Vantaa's registry in writing: City of Vantaa, Registry, Asematie 7, FI-01300 Vantaa</p>
<p>19. Right to erasure</p>	<p>The data subject shall have the right to obtain from the controller the erasure of personal data concerning them without undue delay provided that:</p>

	<ul style="list-style-type: none"> c) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; d) the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing; e) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing (grounds relating to their particular situation), or pursuant to Article 21(2) (direct marketing); f) the personal data have been unlawfully processed; or g) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject. <p>The right to erasure is not applied, if the processing is necessary:</p> <ul style="list-style-type: none"> a) for exercising the right of freedom of expression and information; b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3); d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or e) for the establishment, exercise or defence of legal claims.
<p>20. Right to restriction of processing</p>	<p>The data subject shall have the right to obtain from the controller restriction of processing, if:</p> <ul style="list-style-type: none"> a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject. <p>Where processing has been restricted based on the above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.</p> <p>A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.</p>
<p>21. Right to object</p>	<p>The data subject shall have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on</p>

	<p>point (e) (performance of a task carried out in the public interest or in the exercise of official authority vested in the controller) or (f) (implementation of the legitimate interests of a controller or a third party) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</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 them 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>Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to their particular situation, shall have the right to object to processing of personal data concerning them, unless the processing is necessary for the performance of a task carried out for reasons of public interest.</p>
22. Right to data portability	<p>The data subject shall have the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:</p> <ul style="list-style-type: none"> a) the processing is based on consent or a contract; and b) the processing is carried out by automated means. <p>In exercising their right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The exercise of the right referred to here shall be without prejudice to Article 17 (right to erasure) and it shall not adversely affect the rights and freedoms of others.</p>
23. Right to withdraw consent	<p>Insofar as the processing of personal data is based on consent, the data subject has the right to withdraw the consent they have given for the processing at any time without it affecting the lawfulness of processing based on consent before its withdrawal.</p>
24. The right to lodge a complaint with a supervisory authority	<p>Every data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to them infringes the data protection legislation. In Finland, the complaint is lodged with the Data Protection Ombudsman. The office of the Data Protection Ombudsman gives advice on how to lodge a complaint. The Data Protection Ombudsman's telephone guidance gives general guidance and advice relating to data protection as well as explains whether a matter requires more specific investigation and processing.</p> <p>The office of the Data Protection Ombudsman (https://tietosuoja.fi/en/contact-information) Visiting address: Ratapihantie 9, 6th floor, FI-00520 Helsinki Postal address: P.O. Box 800, FI-00521 Helsinki</p>



**RECORDS OF PROCESSING
ACTIVITIES**
EU General Data Protection
Regulation (679/2016) articles
12–22 and 30
25 March 2019

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	Telephone (switchboard): +358 (0)29 56 66700 (https://tietosuoja.fi/en/telephone-guidance) Fax: +358 (0)9 566 6735 Email: tietosuoja@om.fi
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