

The processing of personal data in the City of Turku

The General Data Protection Regulation (GDPR) (EU) entered into force in spring 2016. The national application of the regulation began on 25 May 2018. The City of Turku is also affected by GDPR, and we have developed and updated our methods and processes concerning personal data to correspond with the new data protection legislation. We are still waiting for the national legislation and instructions regarding several matters, which means that this information is updated constantly. The rights of data subjects (people who have personal information on them stored in the city's registers) are improved by the GDPR, although the previous Personal Data Act already guaranteed extensive rights for the data subject in Finland.

You can find information concerning your rights and the personal data collected from you on this website.

Data subjects in the city's personal data file

The City of Turku needs to store personal data on you in our registers in order for us to be able to provide you with our services. Some of the data is confidential. This page includes more details on

- why and for what purpose are the data collected,
- the categories of collected data,
- the data retention period,
- the rights you have as a data subject,
- who will receive your data,
- whether we transfer the data outside the EU or EEA, and
- how we protect your personal data.

1. Why and for what purpose are my personal data being collected?

The City of Turku provides its residents with both statutory and additional services. The high-quality provision and planning of these services and their monitoring, invoicing and statistical compilation require processing the personal data of the services' users. The legal bases for the processing of data include several laws and regulations, and in some cases your consent. More information about the purposes and lawfulness of the processing of personal data is available in Finnish in our register descriptions at <https://rekisteri.turku.fi>.

2. What data about me are being collected?

We will only collect the necessary and required data on you when you use the services of the City of Turku. The typically collected identification and contact data include the following: name and personal identification number, place of residence, address, telephone number, contact person appointed by you, the contact details of the guardian of underage child or legal representative (if necessary), native language/service language. We will also collect service-specific data on you that is required to provide you with the service in question. In cases of emergency, we receive assignments from the emergency services and collect the data required to perform these assignments.

3. For how long will my personal data be stored?

We will store your personal data for the duration stipulated by law. The personal data retention periods are defined in the City of Turku Code of Conduct.

4. What kind of rights do I have?

The rights of the data subject—your rights—are defined in the General Data Protection Regulation (EU) and the forthcoming national data protection legislation. Your rights concerning your personal data as the data subject are described below.

Right to be informed of the processing of personal data

You have the right to be informed of the processing of your personal data. More information about the processing of personal data can be found at www.turku.fi/en/turku-info/privacy-policy. If you want additional information regarding the processing of your personal data, please contact the contact persons defined in the register descriptions.

Right of access personal data

As a data subject, you have the right to be informed of whether data concerning you are processed in the organisation of the City of Turku. We are obligated to grant you access to your personal data, e.g. by providing copies of documents concerning you. Please note that the right is personal.

Data request concerning personal data

You have to submit your request personally at a City of Turku office or by a document with your handwritten signature or a correspondingly verified document. Alternative ways of submitting your request are listed below.

1.) Personal submission.

- You can submit your request to inspect your data personally at the City of Turku Turku-Piste at Puolalankatu 5. We kindly ask you to be prepared to provide a proof of your identity and to specify the categories of requested personal data.
- When visiting the Turku-Piste personally, you can ask the person serving you to provide you with the stored data on you and data concerning your use of services such as your contact details, and if necessary to rectify them.

2.) Submitting an informal request by mail.

If you want to receive print-outs or copies of documents describing the information concerning your personal data, you need to submit an informal request with your handwritten signature, name, personal identification number, postal address, telephone number, email address and the requested personal data. The request can be sent by mail to PO Box 355, 20101 Turku or submitted personally at the Turku-Piste at Puolalankatu 5, 20100 Turku.

Right to restrict access to your data

According to Section 34 of the data protection legislation, in exceptional cases the City of Turku has the right to restrict your access to your data. We will inform you about possible restrictions with a written statement that includes the reasons why we were unable to fulfil your request. Such exceptional cases include

- situations where providing the data might compromise national security, national defence or public order and safety or hinder the prevention and investigation of crimes
- situations where providing the data might cause a serious threat to the data subject's health or treatment or to the rights of the data subject or someone else

- situations where the personal data is used in control and audit tasks and not disclosing the data is necessary for the purposes of ensuring the economic and financial safety of Finland or the European Union.

Right to request the rectification of personal data

You have the right to request the rectification of inaccurate data concerning you. If you feel that your data require rectification, you can present your request by:

- Submitting an informal written request with grounds for the rectification and specific details about the data to be rectified, what data you consider to be accurate and the requested manner of rectification. All data to be replaced, erased and completed must be described in detail. The request can be sent by mail to PO Box 355, 20101 Turku or submitted personally at the Turku-Piste at Puolalankatu 5, 20100 Turku.

If we decline your request to rectify your data, we will provide you with a written reply with reasons why we were unable to fulfil your request.

Whenever a patient requests a change in their medical records, the grounds for the rectification, completing or erasure of the records and the necessity of the data for treatment are evaluated. Justified decisions regarding treatment made by a health care professional cannot be overruled even if the patient disagrees with them. Entries that were considered to be accurate at the time of the entry are not considered to be inaccurate even if the entry was later proven to be inaccurate, e.g. in the case of a false diagnosis.

Right to data erasure or the right to be forgotten

In some cases, you have the right to request the City of Turku to erase your data stored in its register. However, this right is not valid when the basis for the processing of personal data is statutory.

Right to data portability

In some cases, you have the right to request the City of Turku to provide you with your data to be transferred to another system. However, this right is not valid when the basis for the processing of personal data is statutory.

Right to be informed of personal data breaches

You have the right to be informed of personal data breaches if the personal data breach is considered to result in a high risk to your rights and freedoms. In such cases, we will inform you of the breach without undue delay.

Right to lodge a complaint with the data protection authority

You have the right to lodge a complaint with the data protection authority if you consider the processing of your personal data to violate the applicable legislation. The complaint must be lodged according to the instructions provided by the data protection authority.

In addition, subject to the applicability of legislation, you might have the following rights:

- **Right to restriction of processing** The data subject has the right to request that their personal data are not processed when the accuracy of the personal data is contested by the data subject.
- **Right to object:** Under specific circumstances, the data subject has the right to object to the processing of their personal data.

- **Right to object to automated individual decision-making (including profiling):** Under specific circumstances, the data subject has the right to object to automated individual decision-making, including profiling.
- **Right to access the medical record access log data:** According to the Act on the Electronic Processing of Client Data in Social and Health Care (9 February 2007/159), by submitting a written request to a health care service provider, you have the right to receive information of the parties that have access to your data and the parties your data has been disclosed to and the grounds behind these processes.
- If you want to receive access log data concerning your data, you must submit a written request to the Registry of the Welfare Division of the City of Turku. [Browse the City of Turku Welfare Division privacy forms \(in Finnish and Swedish\)](#).

5. Who will receive my data? Are my data disclosed to third parties?

In certain cases, your data can be disclosed to third parties such as the National Archive of Health Information or other national registries and public authorities.

The processing of personal data on behalf of and for the account of the City of Turku

Our operations involve the disclosure of data to parties that process also personal data on our behalf and for our account, such as providers with whom we have entered into a service agreement. External processors of personal data in our operations include system providers we have entered into an agreement with and other external service providers. Whenever acquiring services from external service providers, we only select such partners as processors of personal data that observe good personal data protection practices and fulfil the requirements of the General Data Protection Regulation. All requirements concerning data protection are verified by means of written agreements.