



Privacy statement

General Data Protection Regulation (2016/679), Articles 13 and 14

Privacy statement for the City of Helsinki's liberal adult education

Data controller

The Education Committee has delegated the duties of the controller to the Head of the Education Division (Education Committee, 20 November 2018, §250).

Why do we process your personal data and on what grounds?

Personal data is processed to organise the teaching activities of the Helsinki Adult Education Centre and the Swedish Adult Education Centre Arbis.

The purpose of processing personal data in the register is to organise the teaching activities of the adult education centres and the library's lending activities. To provide these services, we need to know who the students are, who the teachers are and who has borrowed materials. The system generates billing information for students, attendance data for students, payroll information for teachers, and borrowing records. For credit courses, the purpose of the processing is also to record credit data in the national KOSKI education register with the student's consent. Personal data is also automatically transferred to the KOSKI register to enable the provision of government-funded liberal adult education by the Service Centre for Continuous Learning and Employment (SECLE).

Point (a) of article 6(1) of the EU General Data Protection Regulation. The data subject has given consent to the processing of their personal data for one or more specific purposes.

Point (b) of Article 6(1) of the EU General Data Protection Regulation. The processing is necessary for the performance of a contract or for taking pre-contractual measures at the request of the data subject.

Point (e) of Article 6(1) of the EU General Data Protection Regulation: 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;

What personal data do we process about you?

Last name, first name, preferred first name, gender, personal identity code, student number, address, username, marketing opt-out, education and employment status, mother tongue and service language, telephone number and e-mail address, loans, liberal arts education to be completed, start and end date of studies, studies completed and competence assessment, consent to the transfer of data to the KOSKI register on credit courses.

The data subject groups are teachers, students and borrowers.

Where do we collect your personal data?

We collect personal data from the data subjects themselves when they enrol for courses at the Helsinki Adult Education Centre through the Ilmonet.fi website, by phone or at a service point. Registration on Ilmonet.fi requires authentication using bank credentials or a mobile certificate via the suomi.fi service.

The information can also be collected from a person authorized by the registrant. By phone or at service points, you can register one additional person for the course, provided

you have their complete contact information and personal identification number. A reserved course place on Ilmonet is personal.

The information regarding library services is collected from the individual themselves either at the library's customer service desk during the borrowing of materials or when the individual registers as a library user independently in the online library.

To whom do we disclose or transfer your personal data?

Along with the billing information, we transfer contact information to Visma Pay, the city's e-payment service, and Talpa, the City of Helsinki's Department of Financial Management Services. The basis for teacher pay is transferred to Talpa.

Student completion data for government-funded liberal adult education approved by the Service Centre for Continuous Learning and Employment (SECLE) is transferred to the Finnish National Agency for Education's National Registry and Data Transfer Service for Study Rights and Completed Studies (KOSKI). Student data to be transferred includes the liberal adult education programs they are pursuing, the start and end dates of their studies, as well as completed studies and competence assessments.

In terms of library services, the borrower's information is transferred to the Koha library system. The information to be transferred includes the name, date of birth, phone number, email address, and borrowing details.

For JOTPA funding, information is disclosed about the actual owner and beneficiary (or actual owners and beneficiaries) of the final recipient of the funds. JOTPA collects information about the first name, last name and date of birth of the person(s).

For credit courses, any credit course completion data (name of the course and its scope in credits, its end date and competence assessment) and first and last name, personal identity code (or learner number if they do not have a Finnish personal identity code) are transferred to KOSKI with student consent.

Information can be transferred for use in research and development projects. Data is transferred only with the student's consent.

Will your personal data be transferred outside the EU or EEA?

The personal data of data subjects will not be transferred outside the EU or EEA.

How long do we retain your personal data?

The storage and deletion of data is carried out in accordance with the City of Helsinki Information Control Plan (<https://tiedonohjaus.hel.fi/>).

Automated decision-making and profiling

Personal data will not be processed for any automated decision-making or profiling.

Your rights regarding the processing of your personal data

The rights of the data subject and instructions on how to exercise them can be found at:

<https://www.hel.fi/en/decision-making/information-on-helsinki/data-protection-and-information-management/data-protection/rights-of-data-subjects-and-exercising-these-rights>

Right to review data (right of access to data, Article 15)

You have the right to know which of your personal data is being processed and what data has been stored about you. The city will provide the information without undue delay, at the latest within one month of receiving the request. If necessary, this period may be extended by a maximum of two months if the request is of exceptional scope and complexity. If the time limit is extended, the city will inform the person requesting the

information of this within one month of receiving the request, also stating the reasons for the delay.

If the city refuses to carry out your review request, it will inform you of this no later than one month after receiving the request. The city will also indicate the reasons for the refusal unless this compromises the purpose of the refusal. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned in this connection.

Right to rectification (Article 16)

You have the right to request that the city rectify any inaccurate personal data concerning you without undue delay. You also have the right to have any incomplete information completed. Any incompleteness in the data will be resolved by taking into account the purpose of the processing of personal data.

If the city does not accept your request for rectification, it will issue a written certificate stating the reasons why the request was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies is also mentioned in connection with the certificate.

Right to be forgotten (Article 17)

You have the right to request the erasure of your data in the following cases:

- You withdraw your consent, on which the processing was based, and there is no other legal basis for the processing.
- You object to the processing of your data for direct marketing.
- You object to the processing for a reason related to your specific personal situation, and there is no legitimate reason for the processing to continue.
- Your personal data has been processed unlawfully.
- Your personal data must be erased to comply with a legal obligation to which the data controller is subject under Union or Member State law.
- Your personal data has been collected in connection with the provision of information society services and pertains to the personal data of a minor.

If the city does not accept your request for erasure, it will issue a written certificate stating the reasons why the request was not accepted. The possibility of lodging a complaint with a supervisory authority and of seeking other remedies will also be mentioned in this connection.

The right to have data erased does not apply if the processing is based on compliance with the city's statutory obligation, the performance of a task carried out in the public interest or the exercise of public authority vested in the city.

Right to restriction of processing (Article 18)

In certain situations, you may have the right to request that the processing of your personal data be restricted until your data has been duly verified and corrected or completed. Such situations include, for example, cases where you dispute the accuracy of your data, in which case the processing of your data will be limited until the city verifies its accuracy.

Right to data portability (Article 20)

You have the right to transfer your personal data from one data controller to another only if you have personally provided your data to the controller, and the processing is based on consent or a contract and is carried out automatically.

This right does not apply to processing that is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority vested in the city.

Right to object (Article 21)

You have the right to object to the processing of your personal data at any time based on your specific personal situation when the processing is based on legitimate interest, the performance of a task carried out in the public interest, or the exercise of official authority vested in the city. In such a case, the data may no longer be processed unless the city demonstrates compelling legitimate grounds for the processing. The processing may also continue if it is necessary for the establishment, exercise or defence of legal claims.

Data subject's right to withdraw consent (Article 7)

When the legal basis for processing your data is consent, you have the right to withdraw your consent at any time. When requesting consent, the city will inform you of the right to withdraw your consent.

The withdrawal of consent does not affect the lawfulness of consent-based processing carried out before the withdrawal.

Right to lodge a complaint with an authority (Article 77)

You have the right to lodge a complaint with a supervisory authority if you consider the processing of your personal data to infringe on the EU General Data Protection Regulation (EU) 2016/679. In addition, the data subject has the right to exercise other administrative and judicial remedies.

[Office of the Data Protection Ombudsman](#)

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How can you contact us about privacy issues?

You can contact us using the contact information provided in this privacy statement.

Contact person

Contact information for the Helsinki Adult Education Centre: tyovaenopisto@hel.fi, tel. +358 9 310 88610

<https://tyovaenopisto.hel.fi/en/about-us/contact-information/>

Responsible person

Director of Liberal Adult Education

Contact details

Contact information for the Helsinki Adult Education Centre: tyovaenopisto@hel.fi, tel. +358 9 310 88610

Contact details for the Swedish Adult Education Centre Arbis: arbis@hel.fi, tel. +358 9 310 494 94

Electronic contact details: The city's e-services portal, <https://www.hel.fi/en/e-services>

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Contact details of the Data Protection Officer

City of Helsinki's Data Protection Officer
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This privacy statement was updated on 26 May 2026.