



Privacy statement

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

Privacy statement for the student administration register for basic education

Data controller

The Education Committee has delegated the duties of the data 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 for the organisation of basic education.

EU General Data Protection Regulation Article 6(1):

(c) the processing is necessary for compliance with a legal obligation to which the data controller is subject;

(e) 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 data controller.

What personal data do we process about you?

The following information about registered pupils:

- basic information and contact details (e.g., name, personal identity code, address, telephone number, guardian/contact person), excluding those who are subject to non-disclosure for personal safety reasons
- information related to studies and schooling
- information related to the pupil's role
- their curriculum, including subjects, courses, course selections and grades
- teaching-related information (e.g., S2 instruction; special support; preparatory education for immigrants; language programme; language immersion and bilingual education; religious or ethical subject)
- information and documents related to support in learning and school attendance
- information related to transcripts and subject/course evaluations
- absences and lesson attendance records
- disciplinary matters
- pupil-specific notes
- matters related to managing cooperation between school and home
- Data regarding religious or philosophical convictions and health are processed as special categories of personal data (Article 9 of the EU General Data Protection Regulation).

The register contains the following personal data on teachers and personnel:

- basic information (name, personal identity code, contact information, gender)
- tasks and job descriptions
- role at the school
- information about employment and official positions
- qualifications
- the date and verification record of the criminal record extract

Where do we collect your personal data?

- Data on incoming first-graders in Helsinki is obtained from Facta.

- The service of the Digital and Population Data Services Agency provides information on pupils and guardians.
- Personal data is obtained from the pupils and guardians themselves on paper, orally or through Wilma's education calendar.
- Personal data (e.g. pedagogical documents) is obtained from the pupils' previous schools.
- When a pupil transfers from a private school to a school under the Education Division, the pupil's data can be integrated into the receiving school's Primus system.

To whom do we disclose your personal data?

The National Registry and Data Transfer Service for Study Rights and Completed Studies (KOSKI) centrally compiles the pupil's study attainments and study rights into a single service. The data is collected directly from the pupil register. (Act on the National Registers of Education Records, Qualifications and Degrees 884/2017)

The necessary information (personal identity code, name, contact details, mother tongue, citizenship, municipality of residence, contact details of guardians and decisions concerning the pupil) is transferred to the pupil welfare services' Apotti customer system.

The necessary information (personal identity code; first name, last name, preferred first name; domicile street address; domicile postal address; school, group/class) is transferred to the school health care services' Apotti system.

Personal data required for the organisation of morning and after-school activities for schoolchildren in accordance with the Basic Education Act, as well as the after-school activities of schoolchildren at playgrounds, are disclosed to the register of morning and after-school activities.

The Culture and Leisure Division, which organises swimming lessons, is provided with the information necessary for organising swimming lessons according to the curriculum (last name, first names; school, group/class).

Information on the need for essential support is transferred to upper secondary schools via the Wilma form filled in at the school.

Pupil data can be transferred on paper to other education providers.

Identification data for pupils and personnel will be transferred to the register of usage rights management for educational IT environments.

Student data may be transferred to other authorities, such as the police or child welfare, if the authorities request it.

The data of compulsory education-aged pupils residing in Helsinki is disclosed to the compulsory education monitoring register.

The following information is disclosed to HSL if the student is granted a travel benefit by the education provider: the child's name, personal identity code, school information and their guardian's email address.

When a pupil transfers from a school under the Education Division to a private school, the pupil's data can be integrated into the receiving school's Primus system.

The Primus system in basic education is used to transfer pupil data from the city's internal system to the upper secondary level Primus systems.

The City of Helsinki has insured all the students studying in the city's schools against accidents. The personal data of students may be disclosed to the insurance company from which the city has purchased the insurance in connection with the handling of insurance claims.

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

Your personal data 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

Your personal data will not be used 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

Information Systems Manager

Responsible person

Director of Basic Education, Finnish-language basic education

Director, General Upper Secondary Education, Vocational Education and Training, and Liberal Education; basic education provided in general upper secondary schools for adults and vocational institutions

Chef för den svenska servicehelheten, Swedish-language basic education

Contact details

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

Information Management, Education Division, City of Helsinki

Työpajankatu 8,

00580 Helsinki

P.O. Box 58300, 00099 City of Helsinki

Contact details of the Data Protection Officer

City of Helsinki Data Protection Officer

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This privacy statement was updated on 11 June 2026.