



Privacy statement

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

Privacy statement on student administrative data in general upper secondary education

Data controller

The Education Committee has delegated the duties of the controller to the Head of the Education Division (Education Committee 20.11.2018 §250).

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

Personal data is processed for the purpose of organising general upper secondary education.

The purpose of processing personal data in the register is to organise general upper secondary education, manage applications to general upper secondary education, and arrange subject studies and unit completion.

The register is used to manage and monitor student learning, teaching arrangements and learning outcomes for each upper secondary school. Teaching arrangements also include documents related to study support, student study and career planning documents, as well as enrolment in and the results of matriculation examinations.

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

Point (c) of Article 6(1) of the EU General Data Protection Regulation: this processing is necessary for compliance with a legal obligation to which the data controller is 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 data controller;

What personal data do we process about you?

For registered students and, where applicable, registered applicants for general upper secondary school:

- basic information and contact details (name, personal identity code, learner number, mother tongue, nationality, possible date of immigration to Finland, address, phone number, e-mail, guardian/contact person, right to free education)
 - We collect the name, personal identity code, address, phone number, and email address of guardians.
- role-related information (upper secondary school graduate, subject student, double qualification student, period exchange student, foreign exchange student)
- their curriculum, including subjects, study units, electives and grades
- teaching-related information (e.g. mode of instruction, S2 instruction, language programme, religious or ethical subject)
- information related to learning support and special needs education
- personal study plan, matriculation examination plan, further study plan, career plan
- information related to transcripts and subject/course assessments
- absences
- disciplinary matters
- general upper secondary education application data (entrance examinations and entrance examination results, application information, language assessment)
- statutory applications and decisions (suspension of compulsory education, exemption from subjects, extension of the right to study).
- personal data related to student welfare (first name, last name, personal identity code, gender, domicile code, school or unit, class/group, year level, start date).

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 staff:

- basic information (name, personal identity code, learner number, address, telephone number, email address, 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 archived in multiPrimus for a registered student in a Helsinki comprehensive school
- Information provided by the registered student or person applying for upper secondary school education – Information provided by the registered student's guardian
- National Registry and Data Transfer Service for Study Rights and Completed Studies (KOSKI)
- Information on applying for studies is obtained from the Studyinfo service
- Basic information about students and parents is obtained from the Digital and Population Data Services Agency (DVV)
- Enrolment data for matriculation examinations are reported to the Matriculation Examination Board (YTL), and the examination results are obtained from there
- For student welfare, information is obtained from Apotti. Apotti retrieves student data from DVV.

To whom do we disclose or transfer your personal data?

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

Information related to matriculation examinations (name and personal identity code; candidate number; subjects that the candidate is taking; completion time; special arrangements; degree type) is transferred to the Matriculation Examination Board for registered students who have enrolled as examinees.

The information necessary for the customer relationship will be transferred to Student Welfare's customer system when the customer relationship begins (personal identity code, name, contact information, mother tongue, nationality, municipality of residence, guardian contact information and decisions concerning the student).

Information about students (including those with a double qualification) is transferred between the Helsinki Vocational College (Stadin AO) and the Primus system for basic and upper secondary school instruction.

Student identification data is transferred to the access rights management register of IT environments for education, through which usernames and access rights for educational IT services are granted and maintained for the student.

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?

Data from the register 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](#)

Visiting address: Lintulahdenkuja 4

Postal address: PO Box 800, FI-00531 Helsinki, Finland

Email: tietosuoja@om.fi

Telephone exchange: +358 29 56 66700

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, Education Division

Responsible person

Director, Upper Secondary Education, Vocational Education and Training, and Liberal Education for Finnish-language upper secondary education

Chef för den svenska servicehelheten for Swedish-language upper secondary education

Contact details

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

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's Data Protection Officer
tietosuoja@hel.fi
+358 9 310 1691 (telephone exchange)

This privacy statement was updated on 1 July 2025.