

Description of processing

EU General Data Protection Regulation (2016/679)

3.9.2026

Privacy policy for user experience development

1. Data controllers

Metropolitan Area Transport Ltd ("Kaupunkiliikenne"), business ID 32510021

Helsinki Region Transport – joint municipal authority ("HSL"), business ID 22745863

Contact details for Kaupunkiliikenne:

Address: PO Box 100 (Hämeentie 86), 01022 KAUPUNKILIIKENNE.

Telephone (switchboard): +358 (0)9 5104 6000

Email: tietosuoja@kaupunkiliikenne.fi

HSL's Data Protection Officer is:

Maria Puhtimäki

Address: PO Box 100, 00077 HSL

Telephone (switchboard): +358 (0)9 4766 4444

Email: tietosuojavastaava@hsl.fi

2. Person in charge of the register

Role title

Communications Manager

3. Contact person for the register

Role title

Communications Specialist

4. Purposes of processing personal data and legal basis for the processing

Purposes of processing

- The data is used to reach users through different forms of invitations to participate, such as surveys and workshop invitations. The aim is to improve and communicate the user experience of the fleet and the environment in which it is used.
- Users may prohibit the use of their data at any time

Legal basis for the processing

Article 6(a) of the EU General Data Protection Regulation, according to which processing is permitted if the data subject has given explicit consent to the processing of personal data for one or more specific purposes (GDPR Art. 6.1.a). Consent can be withdrawn at any time.

Relevant legislation

- EU General Data Protection Regulation (679/2016)
- Data Protection Act (1050/2018)

In addition, for HSL:

- Act on Cooperative Action Between Municipalities in the Helsinki Metropolitan Area in Waste Management and Public Transport (829/2009)

5. Data content of the register

The following data regarding the data subjects is recorded in the register either fully or partly:

- The register contains the person's email address and municipality of residence.
- In connection with a separate workshop registration or user testing, we collect detailed personal data (name, age, municipality) for workshop registration purposes. The data will be destroyed no later than two weeks after the workshop.
- In connection with the above-mentioned workshop or user testing, we collect the following data from participants for the purpose of awarding prizes: name, address, phone number and personal identity code. The data will be destroyed no later than two weeks after the awarding of the prize.

6. Regular disclosure of personal data

The register is held by Kaupunkiliikenne. During workshop registration and awarding, the data may temporarily be known to HSL. The results of participation, i.e. survey responses, are always anonymous.

The data controllers process the data themselves and also use subcontractors who process personal data on behalf of and for the benefit of the data controllers.

The data controllers may use contractual partners, acting on behalf of the data controllers, to carry out processing tasks technically, commercially or operationally, and personal data may be transferred to them within the framework of cooperation under a data protection agreement.

Personal data will not be transferred outside the EU/EEA.

7. Data retention periods

Data collected in the register will be kept only for as long and to the extent necessary in relation to the original or compatible purposes for which the personal data was collected. We will delete the list six months after the completion of the project in question. The data subject can delete their information at any time.

The data controllers regularly assess the necessity of retaining the data in accordance with their internal codes of conduct. In addition, the data controller takes all reasonable measures to ensure that inaccurate, incorrect or outdated personal data in relation to the purposes of the processing is promptly deleted or corrected.

The more detailed personal data related to workshops and user testing will be deleted no later than two weeks after the workshop or user testing. The personal data of individuals who have received a reward in connection with these will be retained for six years, as required by Section 10 of the Accounting Act (1336/1997).

8. Information sources for personal data

The data in the register is obtained from the data subjects themselves.

9. Rights of the data subjects

Your rights as a data subject

The General Data Protection Regulation of the EU provides you, as the data subject, with various rights regarding our processing of your personal data. You can exercise these rights in different ways depending on the basis of processing the personal data.

Right of access and inspection

You have the right to know if we process your personal data and which data about you we process.

You have the right to receive your own data free of charge. However, if you request several copies, we may charge a reasonable fee based on the administrative costs.

Right of rectification

You have the right to request that we rectify any inaccurate or erroneous personal data about you or complement incomplete data.

Right of removal, right to be forgotten

In some exceptional cases, e.g. if the processing of data is based on consent and you withdraw your consent, you have the right to have your data removed, i.e. to be forgotten.

Right to restrict processing

In some cases, you may have the right to request that the processing of your personal data be restricted while your data has been reviewed and rectified or completed appropriately. Denying the accuracy of your data may be such a case.

Right to transfer data from one system to another

You have the right to transfer your personal data from one data controller to another if you have submitted the data to us personally and the processing of data is based on consent or an agreement and the processing is automated.

Right to contest an individual automatic decision

You have the right not to be subjected to such a decision based on automated personal data processing that has legal repercussions or other similarly significant consequences for you. Automated decision-making refers to a process where a human is not involved in the decision-making, and the decision is made through automation based on the personal data.

Kaupunkiliikenne does not use automated processing of personal data to make such decisions.

How to exercise your rights

You can make a request for your personal data:

- by email to tietosuoja@kaupunkiliikenne.fi
- by letter to Tietosuoja – hallintopalvelut, PO Box 100 (Hämeentie 86), 01022 KAUPUNKILIIKENNE.

Please state in your request which rights you wish to exercise and also, when possible, which of our registers your request concerns. You can find a list of our registers and their descriptions on this page.

We will respond to all requests about personal data as soon as possible and within one month from receiving the request, at the latest. If the request is especially complicated, we may need to prolong the processing time by two months, at the maximum. We will always inform you of a prolonged processing time and the reasons for the prolongation within a month from receiving the request.

Right to lodge a complaint with authorities

You have the right to lodge a complaint with the data protection authorities if you suspect your personal data is being processed in a way that goes against the data protection legislation. In Finland, such an authority is the Data Protection Ombudsman.

The contact information of the Office of the Data Protection Ombudsman:

Street address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: PO Box 800, FI-00531 Helsinki

Email: tietosuoja(at)om.fi

Switchboard: +358 (0)29 566 6700

Registry: +358 (0)29 566 6768