

Juha Aartoaho

Privacy statement for the customer and stakeholder register of the Association of Finnish Municipalities

The Association of Finnish Municipalities acts as an advocate of its member communities, provides expert services, and undertakes research and development activities for the needs of its membership.

We, at the Association of Finnish Municipalities, are committed to protecting the privacy of the users of our services and to complying with the data protection legislation and good data protection policies in all our activities. We endeavour to offer you a safe and secure user experience. This privacy statement provides information about our practices regarding the collection and processing of personal data.

Controller of the customer and stakeholder register of the Association of Finnish Municipalities:

Association of Finnish Municipalities (hereinafter Association of Municipalities), business ID 0926151-4, Toinen Linja 14, FI-00530 Helsinki / PO Box 200, FI-00101 Helsinki.

The person responsible for the register is Paula Kurkipää, Service Manager for the Association of Municipalities (asiakaspalvelu@kuntaliitto.fi).

Juha Aartoaho is the Data Protection Officer for the Association of Municipalities. (tietosuojaavastaava@kuntaliitto.fi).

1. Whose personal data do we collect?

1. Contact information of the member communities of the Association of Municipalities, service contract customers as well as persons acting as their representatives
2. Contact information of persons who have used the services of the Association of Municipalities and the organisations they represent
3. Contact information of persons who have given their consent for marketing in other ways and the organisations they represent
4. Contact information of stakeholders
5. Contact information of persons acting in positions of trust for the Association of Municipalities
6. Information on those who have been awarded badges of honour or merit



7. Information on events and procedures associated with the handling of the above-mentioned tasks of the Association of Municipalities

2. What kind of personal data do we process?

We maintain the following customer information in our customer and stakeholder register:

1. Contents of questions received and answers given by our expert service provided by telephone, email or letter as well as related appendices
2. Contact information used for our membership communication, for communication with customers and stakeholders as well as for marketing purposes
3. Contact information for mutual communication between different occupational groups within the municipal sector
4. Records used in the maintenance of our customer relationships
5. Information concerning the members of our following bodies: The Delegation and the Board of the Association of Municipalities, the Advisory Committee for Small Municipalities and the Advisory Committee for Swedish-speaking Municipalities.

We may save the following personal data concerning a data subject:

1. Surname, first name, organisation, job title, role (employment relationship / acting in a position of trust), language, address, telephone number, email address and any other contact information.
2. Information from customer feedback and service requests as well as wishes with regard to the customer relationship.
3. For persons who have been awarded a badge of honour or merit, we also save their social security number (as it is not possible to unambiguously identify the person without it).
4. History data concerning badges of honour and merit.
5. Invoicing information related to our services.
6. Other requests and notes regarding the provision of our services and other issues.
7. In connection with events, we may collect information concerning allergies and diets.
8. Bans, instructions, restrictions, consents and other choices determined by our customer organisation or its representatives or by our handler.
9. IT administration data, including technical identifications, log information, usernames, technical data associated with the use of the services on offer.
10. Contact information necessary for paying fees, such as a bank account number.
11. For those who have acted in positions of trust for the Association of Municipalities, we also store information on their previous periods in positions of trust due to the usability of the information.

3. From where do we obtain personal data?

Primarily, we obtain your data from you in connection with your customer relationship, use of services, invoicing, payment of fees, communications and other dealings.

We may also obtain data from the following sources:

1. From parties who offer publicly available contact information and data on responsible persons.
2. From the companies within the Association of Municipalities Group
 - FCG Finnish Consulting Group Oy
 - KL-Kustannus Oy
 - Kuntaliitto Holding Oy
 - Kuntaliitto Palvelut Oy
 - Kuntatalo Oy
 - The Foundation of Finnish Municipalities
3. We may collect data concerning municipalities and joint municipal authorities from the joint service data pool of public administration.
4. We may also add data provided by the partners of the Association of Municipalities in so far as we consider them to advance the benefits of our members or other customers or to improve the quality of the services provided by us.

4. For what purpose do we use personal data and what is the legal basis for processing it?

We may process your personal data for the following purposes:

1. Transmission of information to our members and stakeholders:
 - Maintenance, development and monitoring of our customer relationships, customer service and related communications
 - Communications with our stakeholders
 - Networking
 - Electronic newsletters
 - Targeting of our customer and marketing communications
 - Statistics associated with the tasks of municipalities and our activities as well as customer surveys
 - General letters
 - Other application directives and recommendations
2. Expert service provided by us:
 - Customer-specific guidance by phone and email and through websites and other similar channels as well as expert presentations at events.
3. Development of our product and service range and our courses of action
4. Awarding of and invoicing for badges of honour and merit ordered from us by our customer organisations

5. Itemisation of customer organisations and data subjects and verification of their authority to act
6. Acknowledgement of special days
7. Presentation of badges of honour and merit
8. Prevention and settlement of cases of misconduct and problem situations
9. Safeguarding of our own judicial protection as well as that of our customer organisations and their representatives
10. Meeting our commitments based on legislation and official regulations
11. Event management (processing data concerning event participants)
12. Invoicing for procured services
13. Payment of fees for agreed performances
14. Paying suppliers' invoices
15. Contract management
16. Competition management (processing data concerning competition participants)
17. Journalistic work, for example, drafting and publishing articles and interviews
18. Conducting questionnaires and utilising the replies given in them

The primary legal basis for the processing in accordance with the above-mentioned uses is our legitimate interest that is based on the customer relationship between us and our customer organisation or on an assignment commissioned by a representative of the customer organisation or on the co-operation relationship with our stakeholder or their contact person. When these interests are not met, the uses can be processed on the basis of an unambiguous consent given by the customer organisation representative.

Additionally, we may be obligated to store some of your personal data to comply with accounting legislation or other compelling legislation during the customer or other relationship and also after it has ended. In such a case, the processing is done on the basis of compliance with a statutory obligation.

5. How long do we store personal data?

We store the basic information on data subjects in our customer and stakeholder register for the duration of the customer relationship unless another storage time is required by accounting legislation or other compelling legislation.

When we receive information stating that a person has left the customer organisation or is no longer our customer due to their position of trust, we remove the personal data of the customer organisation representative from the register. We also remove the personal data from the register if the data subject withdraws their consent to the processing of their personal data.

The service requests regarding our service activities are stored for ten years after the end of the calendar year in which the matter was solved. Service requests

containing personal data related to specific personal data groups are stored for a maximum of two years from the date on which the request has been marked as solved.

In general, recipient data associated with our inquiries are stored for one year and the response data for four years. The storage time may, in certain cases, be longer if we consider there is a justified need for it. We store the personal data concerning those who have been awarded badges of honour or merit for 50 years from the awarding of the latest badge of honour or merit, since the personal data is needed when awarding such badges.

Information on allergies, diets and dates of birth collected for events are stored for 2 months.

The paper documents transferred from the customer and stakeholder register to the archive of the Association of Finnish Municipalities are stored permanently for purposes of research and statistics according to the procedures specified in Section 10.

6. Who processes personal data and to whom can the data be disclosed?

Personal data may be processed by our entire personnel, but they are, however, primarily processed by the experts who respond to service requests and the employees responsible for invoicing.

We may outsource tasks associated with personal data processing or disclose personal data to the customer registers of the following companies of the Association of Municipalities Group for the purposes described in Section 4 of this privacy statement:

- FCG Finnish Consulting Group Oy
- KL-Kustannus Oy
- Kuntaliitto Holding Oy
- Kuntaliitto Palvelut Oy
- Kuntatalo Oy
- The Foundation of Finnish Municipalities

In connection with internal transfers and disclosures of personal data within the Association of Municipalities Group, we guarantee the security and confidentiality of the personal data by always complying with the valid data protection legislation as well as by applying the Group's internal agreements regarding data transfers and data processing.

We may outsource tasks associated with personal data processing to external service providers in accordance with and within the limits of data protection

legislation. External service providers may process personal data only according to the instructions and purposes determined by the Association of Municipalities, when this has been agreed upon separately through data processing agreements.

We may disclose your personal data in a manner required by competent authorities, based on the legislation valid at a given time. These authorities include, among others, tax, police, enforcement and supervisory authorities.

In networking activities, personal data is primarily seen by the members of the network.

We may disclose your personal data for the purposes of scientific or historical research as well as for product development. As a rule, personal data has been changed into a form in which the subject of the data can no longer be identified.

We may disclose your personal data at our discretion in accordance with and within the limits of the data protection legislation. We request that the party asking for personal data provide us with a report on the intended use of and legal basis for the required personal data. We always draw up a written agreement concerning the disclosure. As a rule, personal data has been changed into a form in which the subject of the data can no longer be identified.

7. Transfer of personal data outside the European Union or European Economic Area

Data can be transferred outside the EU or EEA. In connection with the transfer, we make sure that the processing of personal data is done in compliance with the personal data protection valid in the EU/EEA area by using the standard clauses approved by the EU or other similar arrangements.

8. How do we protect personal data?

Only our authorised employees, self-employed persons or partners who have received a personal username and password are allowed to access the personal data. There are different levels of access rights, and each user is granted sufficient rights to perform the task at hand.

Information systems are protected with appropriate technical measures, including regular operating system and application updates, encrypted connections to the environment and a secure network environment.

We store the manually processed material that contains personal data in a locked space which can only be accessed by persons granted a specific right to it.

During archiving, we limit the access rights, as needed, by subject areas to those of our employees for whom it is essential to process the personal data in question in order to carry out their tasks. We store the paper archive in a locked archive space that can be accessed only by the personnel of our registry office for the purpose of handling our archiving and information service.

9. Why do we use profiling?

We may use the stored personal data for profiling purposes. We carry out profiling by creating an identifier for the data subject, which allows us to combine personal data concerning the data subject that is generated in connection with the use of the service. The purpose of profiling is to examine the use of our services and develop our range of products and services as well as for customer relationship management and methods used by our customer service. You can object to the use of your personal data for profiling purposes by notifying us about this in writing.

10. Permanent storage

We permanently store a sample of registered service requests as defined in our data management plan: From 2015 onwards, a sample of service requests resolved during the first three working days of each month, including the initial request and our responses and related appendices, has been defined for permanent storage. We register these email statements in the subject processing system and store them in paper format in our archive for permanent storage (for further details, see [paperiarkistoa koskeva tietosuojaseloste](#)) (in Finnish). Similarly, we also register responses to service requests and questions/statement requests, including attachments, which are subject to an additional fee from customers.

11. Data subject's rights

In case of any questions about the processing of personal data and situations concerning the exercising of one's own rights, data subjects should contact Paula Kurkipää (asiakaspalvelu@kuntaliitto.fi). The Association of Municipalities may, if necessary, ask the data subject to clarify their request in writing, and the identity of the data subject can, as needed, be verified before taking any other action. We may refuse to disclose personal data on grounds determined in the data protection legislation. Exercising the right of access to the data is, in general, free of charge with limitations determined in the data protection legislation.

Access to data:

Data subjects have the right to access personal data concerning them that we have stored in the register. The request for access shall be made in writing as instructed in this privacy statement.

In your request, please detail the following:

- Which personal data you want to access
- Do you want to access all your personal data or personal data from a certain period
- In which format do you want to receive the personal data
- Your name and contact information (for example, email address or telephone number).

Rectification or erasure of data, restriction of processing and withdrawal of consent:

Data subjects have the right to demand rectification of incorrect, unnecessary, incomplete, or outdated personal data concerning them in our register, in so far as they cannot rectify the personal data themselves. The rectification request shall be made in writing.

In your request, please detail the following:

- The personal data to be rectified word for word
- The change you propose word for word
- Justification for the changes you propose
- Your name and contact information (for example, email address or telephone number).

Data subjects also have the right to request the controller to restrict the processing of their personal data in a situation, for example, in which the data subject is waiting for our reply regarding their request for rectification or erasure of their data.

If the lawfulness of processing of personal data is based on the consent of the data subject, the data subject has the right to withdraw this consent at any time.

The right to object to processing of personal data and direct marketing:

In connection with a personal, special situation, the data subject has the right to object to profiling concerning themselves and other processing measures for which we utilise the personal data of the data subject in so far as the processing is based on our legitimate interest. The objection request shall be made in writing.

In your request, please detail the following:

- Whether you wish to restrict or object to the processing of your personal data
- The reasons for restricting or objecting to the processing, except in the case of direct marketing

- Your name and contact information (for example, email address or telephone number).

We may refuse to fulfil the request concerning objection if we have a justified reason to store the personal data in order to carry out our tasks. In such a case, the data subject will be provided with a written certificate of refusal in which the refusal is justified.

The right of the data subject to file a complaint to the supervisory authority

The data subject has the right to file a complaint [to the supervisory authority](#).

12. Further information on the rights of the data subject

Providing your personal data is not a statutory requirement or a requirement based on an agreement or a requirement for drawing up an agreement. The data subject does not have to provide their personal data.

The rights of the data subject have been prescribed by the General Data Protection Regulation (EU 679/2016) of the European Union and supplementary national legislation. The Office of the Data Protection Ombudsman publishes on its website <https://tietosuoja.fi/en> information on the rights of the data subject and gives instructions on exercising one's rights.

13. Changes to the privacy statement

We continue to develop our services and may update this privacy statement as needed. The changes may also be associated with a reform in legislation. If the changes implemented are essential, we will communicate this on our website and/or by contacting you in another appropriate manner.

We recommend that you familiarise yourself with the contents of the privacy statement from time to time in order to remain informed of any possible changes to the statement.

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