



Processing of personal data in the Get Work Vantaa project

In accordance with the EU General Data Protection Regulation, a person must be informed if their personal data is recorded in a personal data register. Personal data includes things such as the data subject's name and address. The data subject must also be informed about the purpose of the processing of personal data, where the data is regularly disclosed and the rights of the data subject.

This document outlines how the City of Vantaa processes your data if you participate in the *Get Work Vantaa* project. The project is based on the *EU's Regional and Structural Policy Programme Innovation and Skills in Finland 2021–2027* and more specifically on its specific objective "*Pathways to work*".

The Häme Centre for Economic Development, Transport and the Environment has granted support by its decision (*Record no.: EURA 2021/201050/09 02 01 01/2022/HÄMELY, hereinafter referred to as the project decision*) to the City of Vantaa for the implementation of the project under the *Act on the Funding of Regional Development and the European Union's Regional and Structural Policy Projects (757/2021)*.

The project will run from 1 June 2023 to 31 May 2025.

The main implementer of the project is the City of Vantaa. With regard to the main implementation, the controller is the Vantaa City Council (Section 1 of Chapter 8 of the *Administrative Regulations of the City of Vantaa*)

Laurea and Metropolia Universities of Applied Sciences are the sub-implementers of the project, acting as separate data controllers for their own project services.

1. For what purpose is personal data processed?

When you participate in the *Get Work Vantaa project* for immigrants, we at the City of Vantaa process your personal data for the purpose of implementing the project in accordance with the project decision and project plan. Our aim is to promote the employment of the people involved in the project and to develop employment more generally.

The project will provide you with the job and career services in English. When you start your project, you can either be unemployed or an employed jobseeker seeking new job opportunities, or you can be an immigrant of working age who has not registered as a jobseeker.

If you are a company (employer's) representative, we process your personal data to find labour for your company, to provide you with support in developing adapted and personalised job opportunities for an immigrant worker in your company and to enable communication between



our project staff and your company. By 'employer's representative', we mean not only the official representatives of the company, but also the people in charge of job management, recruitment and company mentors.

The aim of the project is to create an operating model for Vantaa, especially for the employment of recently settled immigrants who do not yet have sufficient Finnish language skills, in small and medium-sized enterprises in Vantaa and the surrounding area. The aim is to encourage companies to hire immigrants with English language skills, to address the challenges of recruiting and integrating foreign language workers, to support the diversity of work communities, to promote the employment of immigrants and the conditions for accepting foreign workers in Vantaa.

As a client of the project, you will be informed about the Work First model being developed and how you can get involved in its development.

We will never use data for any other purposes, such as direct marketing or commercial aims.

2. The basis of data processing

The processing of personal data necessary for the implementation and organisation of the Get Work Vantaa project is based on the City of Vantaa's obligation to collect the personal data of project participants as required by the project decision. The personal data to be collected is governed by *Section 56 of Act on the Funding of Regional Development and the European Union's Regional and Structural Policy Projects (757/2021)*. The personal data is stored in the *EURA 2021 system*, referred to in Section 50 of the act, the controller of which is the Ministry of Economic Affairs and Employment. You can find the EURA 2021 information document at this [link](#).

Once you have joined the project, you can enter your data into EURA 2021 yourself, provided you have a smartphone or computer and can authenticate with either your online banking credentials or a mobile certificate. If you do not have the possibility to enter your own participation data into EURA 2021, our project staff will help you to do so. For more detailed instructions on how to enter your data, please contact our project staff.

Participation in Get Work Vantaa is voluntary for you. As the City of Vantaa determines the purposes and means of processing personal data in the main implementation of the project, it is also a controller within the meaning of the EU General Data Protection Regulation. For this reason, we will ask you separately for your written consent to process your personal data necessary for the implementation and organisation of the project. In addition to your consent, the processing of your personal data by the City of Vantaa is based on the performance of a task carried out in the public interest by a public authority. In our opinion, the processing of your personal data in accordance with Section 4 (1) (2) of the Data Protection Act (1050/2018) is necessary and proportionate to the purpose of the project. The general interest is related to the



duty of the public authorities to promote employment and to seek to secure the right to work for everyone, as laid down in *Section 18 (2) of the Finnish Constitution (731/1999)*.

We process the personal data of an employer's representative *on the basis of the performance of a task carried out in the public interest*.

Legal basis for the processing:

Article 6(1)(a) and (e) of the EU General Data Protection Regulation (2016/679)

Section 4 of the Data Protection Act (1020/2018)

3. What personal data does Get Work Vantaa collect and for whom?

We collect the following information about you:

- name
- personal identity code
- contact information
- information on education, employment history and professional skills
- language skills and nationality
- whether you are unemployed, employed or outside working life and whether you have started looking for a job during the project, whether you have started studying during the project or whether you have found a job
- the things agreed with the project staff during the consultation process in relation to the promotion of your employment in the project
- dates when you started and finished in the project

We receive the information from you, from the Vantaa-Kerava local government pilot on employment (public employment services register) and from the project partners, the Laurea and Metropolia Universities of Applied Sciences.

We collect the following personal and other identifying information about the employer's representative:

- name
- job title
- telephone number
- e-mail address
- company sector
- business ID
- postal address
- other company contact details
- municipality
- company size



We receive information on employers from the Business Information System (YTJ), the Vantaa-Kerava local government pilot on employment (register of public employment services), the City of Vantaa's Business Information System and from a company's representative when dealing with that company.

4. Is the provision of personal data necessary?

Yes, it is. We cannot carry out the project without processing the personal data of the participants. In addition, the project decision requires the collection of the personal data of the persons participating in the project, as referred to in *Section 56 of the Act on the Funding of Regional Development and the European Union's Regional and Structural Policy Projects (757/2021)*.

5. Is personal data disclosed to third parties?

We only disclose your data if the disclosure is based on legislation or if you have given your consent to the disclosure of your data.

Your personal data will be disclosed and stored in the EURA 2021 system referred to in Section 50 of the *Act on the Funding of Regional Development and the European Union's Regional and Structural Policy Projects (757/2021)* which is controlled by the Ministry of Economic Affairs and Employment.

The data will never be disclosed to third parties for marketing or other commercial purposes.

6. How is personal data protected?

Data security and data protection have been secured by various technical and organisational measures to ensure your privacy. For example, personal data may be processed only by persons who need it to perform their work or official duties and only to the extent required by an individual task. In the client data system, this is monitored, among other things, by using log information. Paper documents are kept in city archives in a safe place that no outsider can access.

Staff are bound by the obligation of professional confidentiality and will continue to be bound by it even after the conclusion of their employment.

7. Is personal data transferred outside the EU or EEA?

In cases where the processor of personal data handles personal data on behalf of the City of Vantaa, the appropriate level of data security and data protection has been agreed to in an agreement with the processor. 'Processor of personal data' means a party that processes personal data for the city, such as a service provider.

As a rule, data is only processed in the EU or EEA area, but the processor can also transfer data outside the EU or EEA. However, such a transfer is only permitted if it meets the requirements



set out in the data protection legislation and the agreement, which ensure an adequate level of protection of personal data.

In the Get Work Vantaa project, the City of Vantaa does not transfer your personal data outside the EU or EEA.

8. What does the city do in case of a security breach?

Despite the protection measures, it is possible in exceptional cases that your personal data may be subject to a security breach or end up in the hands of a third party. In these cases, we will take immediate measures to rectify the situation. If the breach causes a risk to you, we will notify the Data Protection Ombudsman. The notification shall be made no later than 72 hours after discovering the breach. If the security breach poses a high risk, we will also notify you of the security breach.

9. How long is the data kept?

The data are kept and destroyed in accordance with the City of Vantaa's information management plan. The storing times of documents determined in the information management plan are based on legislation, the National Archives of Finland's provisions concerning permanently stored documents and the Association of Finnish Municipalities' recommendations concerning documents stored for a definite period of time. At the end of the period, the data will be destroyed.

The data will be stored as required by the project decision for five years, starting from the beginning of the year following the year in which the last instalment of the project was paid to the beneficiary, i.e. the City of Vantaa. Data relating to financial commitments is kept for 10 years.

10. Will the data be used for profiling or automatic decision-making?

Your information will not be used for profiling or automatic decision-making.

11. What rights does a data subject have, and how can these rights be exercised? How long does processing a case take?

Data subject means the person whose personal data are being processed. If we process your personal data, you have the right to:

- check what data of yours is being processed
- demand the correction of incorrect or inaccurate data
- demand the erasure of your data
- demand the restriction of the processing of your data
- object to the processing of your data
- the right to receive your data and transfer it to another registry as well as to cancel the consent you have given at any time if the processing is based on that consent.



You can also submit an access request in person at Vantaa Info. Access request form is available at Vantaa Info and on the vantaa.fi website. Bring along a passport, driving licence or ID card with a photo to prove your identity. The form can also be delivered by post to the address Kirjaamo, PL 1100, 01030 Vantaan kaupunki. In this case, we will check your identity in some other reliable way.

If you wish to enforce other rights to which you are entitled as a registered party or request additional information on the processing of personal data, please contact the person specified under section 14 below. The legal basis for the enforcement of your rights is verified on a case-by-case basis. In order to enforce your rights, you may have to prove your identity.

We will fulfil the requests without undue delay, but in any case, no later than within one month of receiving each request. If necessary, the deadline may be postponed by a maximum of two months based on the complexity of the request and the quantity of the information. If the deadline is postponed, you will be notified.

12. Is there a fee for the exercise of one's rights?

As a general rule, exercising one's rights is free of charge. However, we may collect a reasonable fee corresponding to the administrative costs or refuse a request if the request in question is clearly unfounded, unreasonable or recurrent. We will contact you if we intend to collect a fee for completing your request. If we refuse to complete your requested measure, you will be informed in writing of the grounds for the refusal and your right to refer the matter to the Data Protection Ombudsman or resort to other legal remedies.

13. How can I submit an appeal to a supervisory authority?

If you suspect that your personal data are being processed unlawfully, you can submit an appeal to the Data Protection Ombudsman. More information and instructions on submitting an appeal are available from the contact person specified in section 14, the city's data protection officer and on the website of the Office of the Data Protection Ombudsman and the office's telephone guidance service:

Office of the Data Protection Ombudsman/www.tietosuoja.fi

Visiting address: Lintulahdenkuja 4, FI-00530 Helsinki

Postal address: PL 800, 00531 Helsinki

Email: [tietosuoja\(at\)om.fi](mailto:tietosuoja(at)om.fi)

Tel. (exchange): +358 29 566 6700

Tel. (helpline for private individuals): +358 29 566 6777

14. Where can I request more information, and who is the controller?

More information on the processing of personal data is available from the contact person specified below. Please note that email is not a safe medium for processing personal data. As such, please do not send sensitive information, such as your personal identity code, via email.



Contact person

Janis Cukurs, Project Manager, Get Work Vantaa project, Urban Strategy and Management Department, Employment and Integration Service Area, Employment Services
firstname.lastname(at)vantaa.fi, tel. 040139 7898

Saara Nykänen, Coordinator/Data Protection contact person for Employment Services, Urban Strategy and Management Department, Employment and Integration Service Area, Employment Services
firstname.lastname(at)vantaa.fi, tel. +358 40 650 3095

Janne Riipinen, Lawyer, Urban Strategy and Management Department, Employment and Integration Service Area
firstname.lastname(at)vantaa.fi, tel. +358 40 500 2745

The controller is the City of Vantaa, City Council (*Chapter 8, Section 1 of the Administrative Regulations of the City of Vantaa*). Contact details of the controller and the City of Vantaa data protection officer can be found below:

Controller

City of Vantaa
City Board
Business ID 0124610-9
Asematie 7, 01300 Vantaa

Data protection officer

tietosuojaavastaava@vantaa.fi

Registry Office

Postal address: PL 1100, 01030 Vantaan kaupunki
Visiting address: Vantaa Info Centre Tikkurila, Dixi, Ratatie 11, 2nd floor, 01300 Vantaa.
Tel. (exchange): 09839 11
Fax +358 9 8392 4163, email: kirjaamo(at)vantaa.fi