



Drawn up 10.12.2020

Reviewed 16.3.2021, Reviewed by: Tarja Nahkiaisaja

Privacy statement EU General Data Protection Regulation (2016/679) Data Protection Act (1050/2018)	
1 Controller	Name: TOPPA project, implementer of ESF project: International Services, City of Kajaani Address: Kalliokatu 7, 87100 Kajaani Other contact details Tel. 08 615 51 (switchboard), kajaani(at)kajaani.fi
2 Contact person in matters relating to the file	Name: Salla-Maija Hakola, Project Manager, TOPPA project Salla-Maija.Hakola@kajaani.fi +358 (0)44 710 1442 Réka Bencsik, Project Coordinator, TOPPA project Reka.Bencsik@kajaani.fi +358 (0)44 710 1428 Other contact details (e.g., telephone during business hours, email address): international.info@kajaani.fi
3 Data Protection Officer	Name: Tarja Nahkiaisaja, tarja.nahkiaisaja(at)kajaani.fi Other contact details (e.g., telephone during business hours, email address): tietosuoja(at)kajaani.fi, tel. 044 710 0666
4 File name	Toppa-hankkeen asiakasrekisteri (Client register of the TOPPA Project)
5 Name of information system	Information system of the City of Kajaani
6 Purpose of processing personal data	Personal data are processed only for predefined purposes. The purpose of the processing is managing and maintaining client relationships during the project. This comprises: <ul style="list-style-type: none"> - communication with clients; - drawing up personal and family-level settlement and integration plans and communication related to the plans; - informing clients of project services, activities and events (marketing); and - managing registrations for activities and events as well as participant details. The collection and processing of contact details requires the consent of the data subject.
7 Content of file	first and last name, address, telephone number, email address, preferred language(s) for communication
8 Regular sources of data	Persons forming the target group of the TOPPA project and taking part in measures implemented by the project (These persons must sign a voluntary consent form including their contact details.) A client may withdraw his or her consent if he or she wishes to do so.



9 Recipients of personal data (regular disclosures of data)	Data recorded in the client register are not disclosed to outside parties.	
10 Disclosures or transfer of personal data outside of the EU or EEA	Data is not transferred outside of the EU or the European Economic Area.	
11 File protection principles	<p>Data protection The City ensures a sufficient standard of data protection and data storage in its electronic systems. The systems are used exclusively by a person who has a personal right of access to it and the appropriate credentials for the purpose.</p> <p>Manual materials Paper consent forms are kept in a locked cabinet in supervised premises. The forms are processed exclusively by project personnel, who are subject to an obligation of professional secrecy.</p> <p>Data processed in the IT system Access to the information system is based on personal user IDs and passwords. The data are processed and stored in a folder, access to which is limited to project staff. The data in the client register may only be used by project staff in their work.</p>	
12 Retention, archiving and destruction of data	Documents are produced in the course of the project and these will be destroyed in keeping with the data retention guidelines. The consent forms are retained for the duration of the project. Two years after the end of the project they will be destroyed in keeping with the organization's guidelines for destroying material that is subject to data protection regulations. The personnel involved are subject to an obligation of professional secrecy.	
13 Right of a data subject to access personal data	A person who has submitted his or her contact details on a consent form has the right to obtain confirmation from the project as to whether data relating to him or her are or are not being processed during the project. If personal data are processed, the data subject has the right to access those data. The TOPPA project must provide a copy of the data processed. The request for a copy may be submitted to the contact persons mentioned on the subject access request form.	
14 Right of a data subject to rectify data	A data subject has the right to erase or rectify inaccurate/incorrect data pertaining to him or her. It is possible to complete incomplete data. Data in the file will be rectified or erased without undue delay.	
15 Other rights relating to processing of personal data	A data subject has the right to file a complaint with the supervisory authority if he or she considers that a violation of the General Data Protection Regulation has occurred in the processing of personal data. The data subject has the right to submit a notification regarding the matter to the Data Protection Ombudsman for consideration of appropriate measures (Office of the Data Protection Ombudsman, Box 800, 00521 Helsinki).	