

## **The City of Helsinki's report submitted to the Office of the Data Protection Ombudsman on 8 July 2024 on the personal data stored on the breached network drive**

The table below was submitted to the Data Protection Ombudsman on 8 July 2024 in response to the request for a report. The table summarises the data that was processed on the breached network drive. It is a summary of the categories of personal data stored on the network drive and which personal data was processed under these categories.

The perpetrator of the data breach gained access to only some of the data that was being processed on the breached network drive, and the table cannot be used to draw conclusions on which personal data from each category or on which specific persons the perpetrator gained access to. The investigation of the extent of the data breach continues.

### **Personal data content of the network drive**

This table categorises the personal data stored on the breached network drive.

**The following should be taken into account when interpreting the table:**

- **This table cannot be used to conclude that the perpetrator of the data breach gained access to specific data on the persons of a specific person group.**
- **The table also includes document types that the network drive was used to store only individual copies of.**
  - Having a document listed in the table does not mean that a large number of those types of documents were compromised. In principle, the network drive was only used to store data that was needed in practical teaching or early childhood education operations.
- **The table only provides an estimate of the personal data that was processed on the network drive.**

| Person group                                                                                                      | Categories of personal data                            | Data/Document                                                                                                                                                                                              |
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| <b>Children in the City of Helsinki's early childhood education and pre-primary education and their guardians</b> | Name and contact information of children and guardians | Several documents contain 'basic information' about children and guardians, such as the pre-school decisions, applicant lists                                                                              |
|                                                                                                                   | Daycare centre and group information                   | Information on which daycare centre and daycare centre group the children are in                                                                                                                           |
|                                                                                                                   | Health information of children                         | Information on allergies and other dietary restrictions due to health reasons (e.g. gluten-free, lactose-free)                                                                                             |
|                                                                                                                   |                                                        | Information on conditions that affect operations (e.g. diabetes, epilepsy) and/or medication used by children                                                                                              |
|                                                                                                                   |                                                        | Documents determining the need for support, such as special support decisions, administrative decisions on intensified or special support in early childhood education, statements on different levels     |
|                                                                                                                   | Financial information of guardians                     | Account numbers and billing information for early childhood education fees<br><br>Possibly information on level of income and family size pertaining to families having applied for a reduction of the fee |
|                                                                                                                   | Personal identity codes of children and guardians      | Decision documents                                                                                                                                                                                         |

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|  | Information on children collected in early childhood education                                | Drafts of texts and writings to be added to group portfolios, lists of event participants<br><br>Other necessary information collected during operations, such as information collected for the processing of claims for damages |
|  | Information produced by children                                                              | Possible examples include drawings made by children, photographs of the results of craft projects or stories written by children that were stored on the network drive                                                           |
|  | Photographs                                                                                   | Photographs taken for group portfolios for which a photography permit has been obtained, other photographs subject to a photography permit                                                                                       |
|  | Information on child welfare notifications or Child Welfare client relationships or documents | For example, child welfare notifications submitted due to the statutory obligations of educational institutions                                                                                                                  |
|  | Information on religious practice                                                             | This information may be apparent based on entries about a child's diet (e.g. no pork) or other recorded preferences expressed by guardians                                                                                       |
|  | Information on mother tongue and language skills                                              | Can potentially be deduced based on whether a child is placed in a Finnish-language or Swedish-language daycare centre and which group the child has been placed in within a daycare centre                                      |
|  | Diet information that is not based on health or religious reasons                             | For example, information on whether a child follows a vegetarian or vegan diet                                                                                                                                                   |
|  | Names and identifying information of alternate pick-up persons                                | Name and date of birth of alternate pick-up person                                                                                                                                                                               |

| Person group                                                                      | Categories of personal data                            | Data/Document                                                                                                 |
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| <b>Persons of compulsory education age living in Helsinki and their guardians</b> | Name and contact information of learners and guardians | System extract from the FACTA population database used for monitoring the realisation of compulsory education |
|                                                                                   | Personal identity codes of learners and guardians      |                                                                                                               |
|                                                                                   | Mother tongue information                              |                                                                                                               |
|                                                                                   | Nationality and religious group information            |                                                                                                               |

| Person group                                                                      | Categories of personal data                                                                                    | Data/Document                                                                                                                                                                      |
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| <b>Pupils of the City of Helsinki's comprehensive schools and their guardians</b> | Information collected for monitoring compulsory education and maintaining the integrity of the Primus database | See table section 'Persons of compulsory education age living in Helsinki and their guardians'                                                                                     |
|                                                                                   | School and class information                                                                                   | Information on which school and class a pupil is in. This information is contained in several documents, such as name lists, school timetables, etc.                               |
|                                                                                   | Subject information                                                                                            | Information on pupils' subjects, optional subjects and additional subjects, such as optional languages and language level (A Swedish or B Swedish)                                 |
|                                                                                   | Health information                                                                                             | Special support decisions, teacher documents on health, allergy and dietary information (e.g. gluten-free diet due to coeliac disease, information on diseases affecting teaching) |

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|  |                                                                                               | Information on any medication that pupils are on that should be taken into account in the organisation of teaching                                                                                                        |
|  | Information produced at the educational institution and processed for teaching purposes       | Information recorded as part of teaching activities, such as school timetables, pupil lists, assessment information                                                                                                       |
|  | Pupils' schoolwork                                                                            | Writings, presentations and other schoolwork produced by pupils as part of studies                                                                                                                                        |
|  | Photographs                                                                                   | School photographs, class photographs, potential other photographs taken during school trips, for which a photography permit has been obtained                                                                            |
|  | Bank account numbers                                                                          | Guardians' bank account numbers may have been included in claims for damages, for example<br><br>Bank account numbers collected from pupils who have been awarded scholarships for the purpose of paying the scholarships |
|  | Information on child welfare notifications or Child Welfare client relationships or documents | For example, child welfare notifications submitted due to the statutory obligations of educational institutions and information processed for notifications                                                               |
|  | Information on disciplinary measures in teaching                                              | Disciplinary forms                                                                                                                                                                                                        |
|  | Information on introduction to working life periods                                           | Information on where a pupil completed their introduction to working life period                                                                                                                                          |
|  | Mother tongue and religion information                                                        | School timetables, information on participation in instruction in these subjects                                                                                                                                          |

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|  |                                                                           | <p>In place of religion, the subject may be ethics or one of the types of religious instruction (Christianity, Islam, Judaism)</p> <p>Information on mother tongue (Finnish/Swedish) or Finnish/Swedish as a second language teaching</p> <p>Information on participation in own mother tongue instruction, if available</p> |
|  | Diet information that is not based on health reasons                      | For example, information on whether a pupil follows a vegetarian or vegan diet                                                                                                                                                                                                                                               |
|  | Information of children attending morning activities organised by schools | Children participating in morning activities (e.g. list of names)                                                                                                                                                                                                                                                            |

| Person group                                                       | Categories of personal data                                                                                    | Data/Document                                                                                                                                                                                                                                                                              |
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| <b>General upper secondary school students and their guardians</b> | Information collected for monitoring compulsory education and maintaining the integrity of the Primus database | <p>See table section 'Persons of compulsory education age living in Helsinki and their guardians'</p> <p>Also applies to adult students. Although their information is not collected for monitoring compulsory education, it is used to maintain the integrity of the Primus database.</p> |

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|  | School and class information                                                            | <p>Information on which general upper secondary school and class a student is in. This information is contained in several documents, such as name lists, school timetables, etc.</p> <p>Information on which general upper secondary school a student is in may reveal additional information about the student if their general upper secondary school has a special educational task (in physical education, for example). Information on which general upper secondary school and class a student is in can also be used to deduce the students' minimum average grade in primary and lower secondary education.</p> |
|  | Health information                                                                      | <p>Special support decisions, teacher documents on health, allergy and dietary information (e.g. gluten-free diet due to coeliac disease, information on diseases affecting teaching)</p> <p>Possibly information on medication used by students</p>                                                                                                                                                                                                                                                                                                                                                                     |
|  | Information produced at the educational institution and processed for teaching purposes | Information recorded as part of teaching activities, such as school timetables and students' course selections                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|  | Students' schoolwork                                                                    | Writings, presentations and other schoolwork produced by students as part of studies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|  | Device information of laptops given to students by the school                           | Models and IP addresses of school laptops given to students, the date on which a laptop was given to a student and whether the student has signed for the laptop                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|  | Photographs                                                        | School photographs, class photographs, potential other photographs taken during school trips, for which a photography permit has been obtained                                                                 |
|  | Bank account numbers                                               | Bank account numbers may have been included in claims for damages, for example<br><br>Bank account numbers collected from pupils who have been awarded scholarships for the purpose of paying the scholarships |
|  | Matriculation examination evaluation and participation information | Matriculation Examination Board's results lists                                                                                                                                                                |
|  | Diet information that is not based on health reasons               | For example, information on whether a student follows a vegetarian or vegan diet                                                                                                                               |

| Person group                                                | Categories of personal data                                                                                    | Data/Document                                                                                                                                                                                                                                                        |
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| Students of Helsinki Vocational College and their guardians | Information collected for monitoring compulsory education and maintaining the integrity of the Primus database | See table section 'Persons of compulsory education age living in Helsinki and their guardians'<br><br>Also applies to adult students. Although their information is not collected for monitoring of compulsory education, it is used to maintain the Primus database |
|                                                             | Educational institution and study programme information                                                        | Information on the fact that a student is studying at Helsinki Vocational College and their study programme<br><br>This information can be found in several documents, including lists of names, timetables                                                          |

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|  | Health information                                                                      | Special support decisions, teacher documents on health and allergy information (e.g. information on diseases affecting teaching)                                                                                                                                                                                                                      |
|  | Photographs                                                                             | School photographs, class photographs, potential other photographs taken during school trips, for which a photography permit has been obtained                                                                                                                                                                                                        |
|  | News information                                                                        | <p>Texts included in news and personal interviews concerning students published on Helsinki Vocational College's website<sup>1</sup></p> <p>Typically, these include the student's name and detail their experiences of studying at Helsinki Vocational College</p>                                                                                   |
|  | Information produced at the educational institution and processed for teaching purposes | Information recorded as part of teaching activities, such as digital schoolwork, timetables and students' course selections                                                                                                                                                                                                                           |
|  | Students' schoolwork                                                                    | <p>Writings, presentations and other schoolwork produced by students as part of studies</p> <p>At Helsinki Vocational College, schoolwork can also include physical objects (metalwork, woodwork), websites or services (e.g. a hairdressing student's portfolio). Information on these types of schoolwork may also be stored on network drives.</p> |
|  |                                                                                         | <p>Bank account numbers may have been included in claims for damages, for example</p> <p>Bank account numbers collected from pupils who have been awarded scholarships for the purpose of paying the scholarships</p>                                                                                                                                 |

<sup>1</sup> For example: <https://stadinao.fi/sarah-ja-ella-ovat-tuoreita-hiusalan-ammattilaisia/>

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|  | Diet information that is not based on health reasons | For example, information on whether a student follows a vegetarian or vegan diet |
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| Person group                                       | Categories of personal data                                                                                    | Data/Document                                                                                                                                                                |
|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Private school students and their guardians</b> | Information collected for monitoring compulsory education and maintaining the integrity of the Primus database | See table section 'Persons of compulsory education age living in Helsinki and their guardians'                                                                               |
|                                                    | School application information                                                                                 | Information on whether a pupil has applied to a specific City of Helsinki school or a specific study programme at a City of Helsinki school via the joint application system |

| Person group                                                                 | Categories of personal data                                                 | Data/Document                                                                                                                             |
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| <b>Children participating in after-school activities and their guardians</b> | Health information                                                          | Special support decisions, teacher documents on health and allergy information (e.g. information on diseases affecting teaching)          |
|                                                                              | Diet information that is not based on health reasons                        | For example, information on whether a pupil follows a vegetarian or vegan diet                                                            |
|                                                                              | Application information concerning after-school activities                  | Information on a place in after-school activities applied for, information on siblings, contact details                                   |
|                                                                              | Client fee payment information and health information affecting client fees | Account number, payment information<br><br>Information processed for the purpose of determining the fee, which may include information on |

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|  |  | <p>guardians' income level or a child's special care programme<sup>2</sup></p> <p>If a pupil is absent from after-school activities due to illness for 11 days, the client fee is not charged – this may be deducted from the payment information</p> |
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| Person group                                                               | Categories of personal data                                                                                                                      | Data/Document                                                                                                                                                                                                                                                                                                                                                                                   |
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| <b>Children participating in playground activities and their guardians</b> | 1st–2nd grade pupils and/or special support pupils in higher grades participating in the after-school activities of playgrounds subject to a fee | See table section 'Children participating in after-school activities and their guardians'                                                                                                                                                                                                                                                                                                       |
|                                                                            | Application information concerning playground activities and information on places applied for                                                   | As a general rule, it is possible to participate in playground activities without advance registration. However, some playground activities are subject to an application:                                                                                                                                                                                                                      |
|                                                                            | Name and contact information of guardians and children                                                                                           | Applications for playground club activities include the following information: name, home address and home phone number of a child and their guardian(s), telephone numbers and email addresses of guardian(s), personal identity codes of a child and their guardian(s), place and start date of the club activities applied for, language skills (Finnish/Swedish) and the application itself |
|                                                                            | Personal identity codes of guardians and children                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                            | Mother tongue and language skills (Finnish/Swedish)                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                            |                                                                                                                                                  | Playgrounds' infant family guidance activities may include advance registration, which involves collecting the names and contact information of participants                                                                                                                                                                                                                                    |

<sup>2</sup> <https://www.hel.fi/en/childhood-and-education/basic-education/morning-and-after-school-activities-clubs-and-hobbies/after-school-activities/fees-for-after-school-activities>

| Person group                                                             | Categories of personal data                                                         | Data/Document                                                                                                                                                                                                                          |
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| <b>Children in private early childhood education and their guardians</b> | Information collected for the payment of separate compensation to service providers | <p>Information on children's siblings for the payment of sibling compensation</p> <p>Date and year of birth for payment of 5-year-old compensation</p> <p>Children's support decisions for the payment of compensation for support</p> |

| Person group                                                                                                                                                                                               | Categories of personal data | Data/Document                                  |
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| <b>Private early childhood education workers (are not City of Helsinki employees, but data on them are collected because the City pays compensation to private early childhood education institutions)</b> | Qualification documents     | Diploma                                        |
|                                                                                                                                                                                                            | Workplace information       | Information on the worker's workplace/employer |

| Person group                                                      | Categories of personal data  | Data/Document                                                                                                                                                           |
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| Swedish Adult Education Centre<br>Arbis' SFI integration students | Name and contact information | This information is stored on a network drive because the information of SFI integration students cannot be processed in the Kursor system due to technical limitations |
|                                                                   | Timetable information        |                                                                                                                                                                         |
|                                                                   | Course information           |                                                                                                                                                                         |

| Person group                                                                                         | Categories of personal data                                                             | Data/Document                                                                                                                                                                                                                                                     |
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| <b>Adult students (general upper secondary school for adults, vocational education and training)</b> | Health information                                                                      | Special support decisions, teacher documents on health and allergy information (e.g. information on diseases affecting teaching)                                                                                                                                  |
|                                                                                                      | Name and contact information                                                            | Full name, address information, email/phone number in the system                                                                                                                                                                                                  |
|                                                                                                      | Personal identity codes                                                                 | Students' personal identity codes in systems and decisions                                                                                                                                                                                                        |
|                                                                                                      | Mother tongue and language skills                                                       | Can potentially be deduced based on the language of instruction of the general upper secondary school for adults (Finnish/Swedish)                                                                                                                                |
|                                                                                                      | Information produced at the educational institution and processed for teaching purposes | Information recorded as part of teaching activities, such as digital schoolwork, timetables, students' course selections, which level of adult education the person is participating in (primary and lower secondary education/general upper secondary education) |

| Person group                   | Categories of personal data                                                                                | Data/Document                                                                                                                            |
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| <b>Apprenticeship students</b> | Basic information of students who are minors collected for the purpose of supervising compulsory education | See table section 'Persons of compulsory education age living in Helsinki and their guardians'                                           |
|                                | Information on apprenticeships                                                                             | Information on where apprenticeship students are completing their apprenticeships, information on the contact persons of apprenticeships |

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|  |                                                    | Names and contact information are collected from the contact persons of apprenticeships            |
|  | Name and contact information                       | Apprenticeship admission decision                                                                  |
|  | Personal identity codes                            | Apprenticeship admission decisions, apprentice students' monitoring lists                          |
|  | Information on social benefits for students        | Information on potential daily allowance or family allowance, information on the amount to be paid |
|  | Information on previous degrees and qualifications | Apprenticeship admission decision                                                                  |

| Person group                                                                                                                                                                                         | Categories of personal data                                  | Data/Document                                              |
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| <b>Employed caregivers (are not City of Helsinki employees), the children under their care and their guardians – collected to ensure the private day care allowance paid by the City<sup>3</sup></b> | Information on families employing caregivers                 | Names and contact information of the children and families |
|                                                                                                                                                                                                      |                                                              | Personal identity codes of children                        |
|                                                                                                                                                                                                      | Employment and background information of employed caregivers | Caregivers' employment contracts and bank information      |
|                                                                                                                                                                                                      |                                                              | Job applications and qualifications and degrees            |

<sup>3</sup> Further information: <https://www.hel.fi/en/childhood-and-education/varhaiskasvatus/tuki-lapsen-hoitamiseen-kotona>

| Person group                                                                                                           | Categories of personal data                                           | Data/Document                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>People who have submitted applications for support for multiple-birth families and adopted children<sup>4</sup></b> | Family contact information and names                                  | Names of family members and family contact and address information                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                        | Personal identity codes                                               | Information on applicants and the children relevant to applications                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                        | Payment information                                                   | Applicants' account numbers and bank information for the payment of support                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                                                        | Information on the fulfilment of eligibility requirements for support | <p>The amount of the Helsinki supplement for adopted children is EUR 264 per month, which is paid for a period of one year from the start of the parental allowance period for an adopted child over one year of age living in Helsinki who is receiving home care allowance.</p> <p>The benefit for multiple-birth families is available to families where more than one child has been born or adopted simultaneously</p> |

| Person group                                                                     | Categories of personal data                     | Data/Document                                                                                                                                                                                       |
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| <b>Persons who have submitted data subject access requests from 2022 onwards</b> | Name and contact information (address or email) | Data subject access requests submitted to the Education Division by data subjects or relayed to the Education Division                                                                              |
|                                                                                  | Personal identity codes                         |                                                                                                                                                                                                     |
|                                                                                  | Health information                              | Sometimes data subject access requests also include background information, such as "I am requesting information for ADHD examinations", in which case the request also contains health information |

<sup>4</sup> <https://www.hel.fi/fi/kasvatus-ja-koulutus/varhaiskasvatus/tuet-lapsen-hoitamiseen-kotona>

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|  | Responses to data subject access requests | <p>Sometimes the response is a statement saying that there is no data. In this case, the only personal data is the statement itself.</p> <p>In other cases, the amount of data provided is high. The documents most typically provided in response are:</p> <ul style="list-style-type: none"> <li>- <b>school certificates</b></li> <li>- <b>student welfare documents</b></li> <li>- <b>early childhood education reports.</b></li> </ul> <p>Such documents are stored as attachments to the provided responses</p> |
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| Person group                                                        | Categories of personal data  | Data/Document                                                                                                                                                                                                                                                                                       |
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| <b>Persons who have submitted claims for damages and appellants</b> | Name and contact information | The V drive was used to store individual claims for damages, which included names and contact information, incident information and bank account information.                                                                                                                                       |
|                                                                     | Incident information         |                                                                                                                                                                                                                                                                                                     |
|                                                                     | Health information           |                                                                                                                                                                                                                                                                                                     |
|                                                                     | Bank account information     | <p>The claims have typically concerned the missing or broken possessions of children.</p> <p>Incident information may include health information relevant to incidents (e.g. injuries)</p>                                                                                                          |
|                                                                     | Appellant information        | The network drive may have been used to store documents related to claims for administrative reviews and appeals concerning appealable decisions. In such cases, data include the name and contact information of the appellant, the decision being appealed against and the grounds for the appeal |

| Person group                                                | Categories of personal data                                                                                  | Data/Document                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Persons who have applied to educational institutions</b> | Entrance exam and application information of general upper secondary schools with a special educational task | <p>General upper secondary schools with a special educational task have different application criteria and collect different information as part of their application processes.</p> <p>Example: Kallio Upper Secondary School of Performing Arts<sup>5</sup>:</p> <ul style="list-style-type: none"> <li>- application form (also includes statements by two teachers)</li> <li>- summary of leisure activities form</li> <li>- ctivity-specific forms and potential appendices, and</li> <li>- free-form application.</li> </ul> <p>Example: Mäkelänrinne Upper Secondary School (physical education)<sup>6</sup>:</p> <p>The purpose of the educational institution's scoring is to support sports associations' scoring to ensure the admission of the most potential athletes. Factors that may be taken into account in the educational institution's scoring include:</p> <ul style="list-style-type: none"> <li>- tripartition of sports: school priority sports, sports included in the school's range of sports, other sports</li> <li>- training and/or coaching conditions of the sport</li> <li>- applicant's motivation to study</li> <li>- athletic potential</li> <li>- any tests and interview used by the school</li> <li>- other possible matters</li> </ul> <p>Example: Helsinki Upper Secondary School of Visual Arts<sup>7</sup>:</p> <ul style="list-style-type: none"> <li>- preliminary exercise, entrance exam</li> </ul> |

<sup>5</sup> <https://www.hel.fi/fi/kasvatus-ja-koulutus/kallion-lukio/tutustu-ja-hae/nain-haet> (page in Finnish)

<sup>6</sup> <https://www.hel.fi/fi/kasvatus-ja-koulutus/makelanrinteen-lukio/tutustu-ja-hae/hae-urheilulukioon> (page in Finnish)

<sup>7</sup> <https://hktl-torkkeli.wixsite.com/hakuopas24> (in Finnish)