

GDPR4 CHILDRN

Processing of personal data in hobbies

A Guide for Children and Young People



Contents

Intro	4
What is personal data?	5
What does 'data protection' mean?	6
Data protection terminology	7
You have data protection rights	8
How can I find out what information has been collected about me?	9
How can I ask someone to erase data they have on me?	11
There are errors in my data – how can I have it corrected?	13
For how long is my data stored?	15
What is my data needed for and why is it being collected?	16
Do I need my custodian's permission for making data protection requests?	17
When can information about my health be needed in my hobby?	18
Can people share photos and video about me without my permission?	19
Who is allowed to process my personal data in the hobby?	20

Icons visualizing data protection

The icons shown below provide information on data protection in a visual form.

Find more information here: [Data protection icons | Data protection in hobbies](#).¹



DATA PROTECTION

Data protection legislation determines how personal data can be processed in hobby activities. Among other things, the controller has an obligation to process personal data with care and inform data subjects transparently about such processing.



CONTROLLER

The party that determines for what purposes and how personal data is being processed in hobby activities is the controller. In hobby activities, the party responsible for the processing of personal data is generally the controller of the personal data.



DATA SUBJECT

The data subject is the person to whom the personal data relates. In hobbies, those participating in the hobby and their custodians can be data subjects. Data subjects have data protection rights, such as the right to access personal data concerning themselves.



CHILDREN'S PERSONAL DATA

Children's personal data must be protected carefully, and children should be informed of the processing of their personal data in child-appropriate terms.

¹ <https://tietosuojaharrastuksissa.fi/en/material-bank/data-protection-icons/>



**SENSITIVE
DATA**

Special categories of personal data or sensitive data include health data and information revealing a person's ethnic origin or religious beliefs.



**PERSONAL DATA
BREACH**

A personal data breach means an incident that results in, for example, the destruction or loss of personal data, or that grants a party not authorised to process the data, access to the personal data.



Intro

You may know that your personal data is processed when you log into your social media account or go to school. But your personal data is also processed in your hobbies. You have probably given some of your personal data, such as your name, contact details, or information about your illnesses or allergies, to the hobby organiser. In many cases, you need to give your personal data to the hobby organiser so that they can contact you, for example to inform you about training schedules. Another example of personal data processing in your hobbies would be your sports team publishing a photo of you on its social media account.

We want to help you become even more aware of how your personal data is being processed in your hobbies and what your rights are. When data protection is in order, everyone can focus on the hobby and rest assured that their personal data is in good hands.

What is personal data?



CHILDREN'S
PERSONAL DATA



SENSITIVE
DATA

Data by which you can be identified is **personal data**.

- Your personal data includes your full name (like Jane Doe), date of birth, personal identity code, home address, telephone number and email address.
- Pictures and video taken of you and recordings of your speech are also personal data. For example, you can be identified from a selfie. Even if you do not use your real name on your social media profile, you can still be identified from the photos.

Some types of personal data are more sensitive than others. It is a good idea to take a moment to consider before giving your information to others or publishing it on social media.

Special categories of personal data include data that can reveal something very sensitive about you. Such data must be protected with particular care. For example, many people do not want to share information about their illnesses to others, and others have no right to know about your illnesses either.

Special categories of personal data, or sensitive personal data, include:

- your religious or philosophical beliefs, that is, the information on what religion you practise or do not practise; and
- your health information (such as information about your illnesses, or patient records written down by a physician at your appointment).



What does 'data protection' mean?



DATA
PROTECTION

Everyone has the right to the protection of their personal data. This is called **data protection**. Data protection protects your personal data from leaking to everyone on the internet. It also prevents someone else from passing themselves off as you by using your name, photos or other information.

When you participate in a hobby activity, such as dancing class, the scouts or football practice, the club or association organising the hobby **processes** your personal data. The club or association has to process your personal data carefully. It needs to make sure that all of your personal data are kept safe and out of outside hands.

'Processing' means everything that the hobby organiser does with your information. For example, collecting data, storing data and disclosing data to others are all forms of processing. If you sign up for a football team and give your name and contact details to the coach, the team is processing your personal data. The team is also processing your personal data when it stores it on a computer or discloses it to a website where results are published. It also counts as processing when your coach asks you if you have allergies, so that the team can get you nut-free snacks for away games, for example.

Data protection terminology



CONTROLLER



DATA SUBJECT

A **controller** is a person, company or association that decides how and for what purposes your personal data is processed. A hobby club can be a controller, for example. If you play ice hockey, your club is probably a controller, because it has information about you, such as your name and maybe your contact details.

You yourself are called a **data subject**. In your hobby, you are a data subject whose personal data is processed by the hobby organiser, such as your sports club.

You can look up other data protection related terms in the glossary on Data protection in hobbies - website: [Term bank | Data protection in hobbies](#).²



Example

Your club decides that it will ask all players to give their contact details so that the coach can contact them about training schedules. The players are asked to fill in their names, home addresses and telephone numbers on a form. The club is a controller, because it decides why and how the personal data is collected.

² <https://tietosuojaharrastuksissa.fi/en/material-bank/term-bank/>

You have data protection rights



DATA SUBJECT

Data protection rights mean that you can ask your club what information it has on you. If your contact details are incomplete or wrong, you can also ask the club to complete or correct them. In some cases, you can even ask the club to erase some information that you no longer want the club to store about you.

How can I find out what information has been collected about me?

You can ask the hobby organiser what information it has on you. When you do so, you can also check that there are no errors in your information and details like your home address and telephone number are correct.

The hobby organiser must tell you what personal data it has on you. You can get a list of the data on paper or by email. For example, if you have filled in a registration form for the hobby, you can check whether the hobby organiser has the data you gave on the form.

What to do:

1. Request the information directly from the hobby organiser, such as your sports team or art school. You can ask for help from your coach or instructor if you are not sure who to ask about the information. You can also find instructions in the privacy statement most hobby organisers have on their website. You can always ask your parent or another adult for help with making the request.
2. In your request, tell the hobby organiser what information you want. You can also ask the hobby organiser to give you all data it has on you.
3. The hobby organiser usually has to reply to your request within a month.
4. If the hobby organiser does not reply within a month or tells you that it does not intend to give you the information, you can contact the Data Protection Ombudsman. The Office of the Data Protection Ombudsman is an authority that supervises data protection, including in hobbies. In some cases, the Office of the Data Protection Ombudsman can order the hobby organiser to give you the information you have requested. You can find our contact details here: [Children's data protection rights | Office of the Data Protection Ombudsman](https://tietosuoja.fi/en/children-s-data-protection).³

³ <https://tietosuoja.fi/en/children-s-data-protection>





Example

Here is an example of an email request:

"Hi,

my name is Jane Doe and I am a player in the RainbowUnicorns United U13 bandy team. I would like to access all of my personal data that the club is keeping in its registers. Could you send the information to me by email to this address?

Best regards Jane Doe"



How can I ask someone to erase data they have on me?

You may have the right to ask the hobby organiser to erase data it has stored about you in its registers. If you request the erasure of some information and your request is accepted, the hobby organiser will delete the data. If all of your data is erased, the club will no longer have any information about you.

The hobby organiser has to erase your data in the following cases:

- When it does not need your data any more. The hobby organiser may not have to store all of your data after you quit the hobby.
- When you want to withdraw a consent that you have given. For example, if you have given information about an illness, you can request the club to erase the information at any time. After that, the hobby organiser no longer has permission to process the data it got from you based on your consent.

It is not always possible to erase or change all of your data even if you wish. Some data has to be kept, for example because the law demands it. Even if that is the case, the Office of the Data Protection Ombudsman can help you make sure that your personal data is not being processed without a good reason.

What to do:

1. **Request the erasure of your data directly from the hobby organiser.** You can ask for help from your coach or instructor if you are not sure where to send your request. You can also find instructions in the privacy statement most hobby organisers have on their website. You can always ask your parent or another adult for help with making the request.
2. **In the request, state which of your personal data you would like to erase and why, or whether you would like the hobby organiser to erase all personal data it has on you.**
3. The hobby organiser normally has to reply to your request **within a month**.
4. If the hobby organiser does not reply within a month or refuses to erase the data, you can contact the Data Protection Ombudsman. The Office of the Data Protection Ombudsman is an authority that supervises data protection, including in hobbies. In some cases, the Office of the Data Protection Ombudsman can order the hobby organiser to erase your personal data from its registers. You can find our contact



details here: [Children's data protection rights | Office of the Data Protection Ombudsman](#).⁴

More detailed information about the erasure of personal data is available on the Office of the Data Protection Ombudsman's website: [If you would like to have your data erased | Office of the Data Protection Ombudsman](#).⁵

⁴ <https://tietosuoja.fi/en/children-s-data-protection>

⁵ <https://tietosuoja.fi/en/if-you-would-like-to-have-all-of-your-data-erased>

There are errors in my data – how can I have it corrected?

If you notice that your name has been spelled wrong or that the hobby organiser has your old address, you can ask it to rectify the errors in the data. You can also ask your club to add information like a missing telephone number to your contact details.

The rectification of data means that

- **you can request the rectification of inaccurate data**
- **you can request the controller to complete incomplete data**

What to do:

1. Request the rectification or completion of your data directly from the hobby organiser. You can ask for help from your coach or instructor if you are not sure where to send your request. You can also find instructions in the privacy statement most hobby organisers have on their website. You can always ask your parent or another adult for help with making the request.
2. In your request, specify which of your personal data you want corrected and how.
3. The hobby organiser normally has to reply to your request within a month.
4. If you do not get a reply within a month or the hobby organiser refuses to rectify your data, you can contact the Data Protection Ombudsman. The Office of the Data Protection Ombudsman is an authority that supervises data protection, including in hobbies. In some cases, the Office of the Data Protection Ombudsman can order the hobby organiser to rectify your personal data.

You can find our contact details here: [Children's data protection rights | Office of the Data Protection Ombudsman](#).⁶

More detailed information about the rectification of personal data is available on the Office of the Data Protection Ombudsman's website: [if you want to have your data rectified | Office of the Data Protection Ombudsman](#).⁷

⁶ <https://tietosuoja.fi/en/children-s-data-protection>

⁷ <https://tietosuoja.fi/en/if-you-want-to-have-your-data-rectified>



Example

You have just signed up for dance lessons. At the first lesson, you write your name and contact details on a form given by the dance instructor so that the dance academy can inform you of lessons. The following week, you notice that the dance academy has not sent the lesson schedule to you. You look your instructor's contact details up on the dance academy website. You ask the instructor to let you check your information because you suspect that there could be a spelling error in your contact details. The dance academy sends you the information they have on you. You notice a typo in your email address. You send a message to the dance academy, asking it to rectify the error in your email address so that you will not miss out on the academy's communications.



For how long is my data stored?



CONTROLLER

The hobby organiser may only process the data it has collected for as long as necessary. It has to determine a storage period for your personal data. If you quit the hobby, the organiser has to erase your data. However, the hobby organiser may sometimes be obliged to keep some of your data also after you quit, for example if it needs them for sending bills.

What is my data needed for and why is it being collected?



Hobby organisers may collect and use your data for many different purposes. They can ask you for the contact details of you and your parents for communication and informing you about schedules. Your club can also request information on your illnesses and allergies to ensure your safety in the hobby.

The hobby organiser must tell you why it has collected your personal data, what it needs the data for, and how it will use the data. For example, if your team has asked for your health information or details about your illnesses or allergies, it has to tell you the purpose for which it needs that information.

The hobby organiser is only allowed to process your data for the purpose for which it was originally requested. For example, it may not disclose your data to others without permission.

If your hobby organiser has data on you, it is required to tell you

- who is responsible for the processing of personal data;
- why your personal data is needed;
- for how long your personal data will be needed;
- whether your personal data will be disclosed to others; and
- how you can exercise your rights regarding your personal data.

The hobby organiser usually provides this information on its website. It could have a privacy statement or a similar page on which it describes its processing of personal data. The registration form for the hobby may also have contained information on why you are being asked to provide data.

Do I need my custodian's permission for making data protection requests?

People of all ages have a right to privacy and the protection of their personal data. Minors also have the right to exercise their data protection rights themselves. If you want to check what data a company, association or club has on you, for example, you can request the data yourself. You do not need your parent's or custodian's permission.

A child's custodian or representative can sometimes exercise the child's data protection rights on the child's behalf. You can discuss your data protection rights, which we talked about above (either a link to the FAQ page or just this reference), with your parents. They can then file the request on your behalf.

In some cases, a custodian or representative of a child may not have the right to exercise data protection rights on the child's behalf. Even minors have the right to their own data, and some laws specify that minors can restrict their custodians' right of access to their data.

More detailed information on when a custodian can exercise their child's data protection rights can be found in the following article on the Data protection in hobbies -website: [Data protection is a fundamental right for minors – what does it mean? | Data protection in hobbies](https://tietosuojaharrastuksissa.fi/en/data-protection-is-a-fundamental-right-for-minors-what-does-it-mean/).⁸

⁸ <https://tietosuojaharrastuksissa.fi/en/data-protection-is-a-fundamental-right-for-minors-what-does-it-mean/>



When can information about my health be needed in my hobby?



Health data is information that describes a person's physical or mental health. It is personal data too.

Health data includes information:

- on a person's illnesses or allergies, such as diabetes or an allergy to nuts;
- on a person's mental health;
- on the medication being taken by someone; and
- on doctor's appointments.

Health data must be protected carefully. The information can be sensitive, and not all people want to share it with others. In your hobby, for example, your coach or instructor may not tell others about your allergy or illness.

The hobby club or association may ask you or your custodian about your illnesses, medication or allergies. That information can be necessary to guarantee your health and safety in the hobby.

However, you should keep in mind that you do not have to tell all of your health information to the club. You can just tell them what they clearly need to know. For example, if you are allergic to nuts and sign up for a scout camp in the woods that includes meals, it is important to tell your instructor about the allergy so that you will not eat nuts by mistake. On the other hand, you do not need to tell them that you had chicken pox three years ago.

People can sometimes ask for your health information based on your consent. That means that it is up to you to decide whether to give the information or not. In such cases, you do not have to give your health information to the hobby organiser if you do not want to.

More information about the processing of health information in hobbies is available from this article on the Data protection in hobbies -website: [Processing children's health data in hobby activities | Data protection in hobbies](https://tietosuojaharrastuksissa.fi/en/processing-childrens-health-data-in-hobby-activities/).⁹

⁹ <https://tietosuojaharrastuksissa.fi/en/processing-childrens-health-data-in-hobby-activities/>

Can people share photos and video about me without my permission?

If the club or association organising your hobby wants to publish photos of participants on its social media channel or website, it must ask permission from the people in the photo. Photos and video can be published if you have given your permission for it. If the club has published a photo or video that you do not want online, you can ask them to take it down.

If necessary, the Office of the Data Protection Ombudsman can order the hobby organiser to take the photos or video of you down from the internet. In some cases, the Data Protection Ombudsman can also order a coach to delete photos they have published on their own social media account.

You can take photos and video for your own use and post them on social media. It is always fair to ask the people in the photos or video for permission before posting them. If you record a video of yourself and your team mates in training and want to post it on your own social media accounts, you can agree about it between yourselves.

Who is allowed to process my personal data in the hobby?



People responsible for children or young people in a hobby normally need access to some personal data. For example, your team's coach may have the right to process your contact details so that they can contact you about things like changes in training times.

Coaches and instructors may also need your personal data to register you for training. There could also be an employee managing your club's membership fees. They are allowed to process your personal data to charge your hobby fees to that you can keep participating.

It could also be important for your own safety that your instructor know about your illnesses so that they will be able to recognise the symptoms. Allergy information can be important on camps or trips where the instructors arrange the meals.

The hobby organiser must ensure that people who do not have the right cannot access personal data. They may not disclose personal data to outsiders either.