

**PRIVACY NOTICE  
FEE-PAID EMPLOYEES  
EU's General Data Protection Regulation (2016/679),  
Articles 13 and 14  
Date: 8 November 2018  
Updated: 29 February 2024**

**1. Data controller**

LUT University (LUT)

Business ID: 0245904-2

Address: Yliopistonkatu 34, 53850 Lappeenranta, Finland

Phone: +358 294 462 111

E-mail: info@lut.fi

**2. Data controller's representative and contacts**

Data controller's representative:

HR Director Sanna Virtainlahti

Phone: +358 500 680 986

E-mail: sanna.virtainlahti@lut.fi

Data controller's contact:

HR Manager Virpi Ristimäki

Phone: +358 46 920 4835

E-mail: Virpi.ristimaki@lut.fi

**3. Data protection officer**

Ilona Saarenpää, Legal Counsel

Phone: +358 50 430 1072

E-mail: dataprotection@lut.fi

**4. Purpose of personal data processing**

Handling matters related to employees' employment relationships.

**5. Legal basis of personal data processing**

The personal data processing is based on the pursuit of legitimate interests by the data controller or the implementation of an agreement.

**6. Content of data file and storage period**

The payment of a fee requires a commission agreement that indicates the fee recipient's name, personal identity code, contact details, degrees, and nationality. The commission agreement is recorded in the university's document management system.

When the employee charges the fee, the payroll system records the name, personal identity code, contact details, nationality, banking connection and taxation information of the employee.

The data is stored permanently in accordance with legislation in force and with storage periods defined in the university's filing plan.

## **7. Information systems employed**

A personal data management system, a payroll system, and a document management system are employed in the data processing.

## **8. Data sources**

Data is mainly collected from the data subjects themselves. The terms of the fee are provided by the liaison for employment relationship matters in the recruiting unit.

## **9. Use of cookies**

Browser-based filing information systems employ cookies to process personal data. A cookie is a small text file that the browser saves on the user's device. Cookies are used to implement services, facilitate login, and enable the compilation of statistics on services. Users may prevent the use of cookies in their browser programmes, but this may prevent the system from operating appropriately.

No cookies are used in the processing of personal data.

## **10. Data transfer and disclosure**

Personal data is disclosed to the following parties beyond LUT University: Certia (information related to the payment of fees) and banks (payment).

Personal data is transferred in accordance with legislation in force to the following: the Finnish Tax Administration (annual notifications), pension insurance companies (pension insurance fees), and the Social Insurance Institution Kela. Wage payment data is also transferred to accounting.

## **11. Data transfer and disclosure beyond the EU or EEA**

Data on employees is not transferred beyond the EU or EEA.

## **12. Safeguards for data processing**

The university's information security rules and guidelines apply to the management of information systems that process personal data. The information systems and their user interfaces are technically protected e.g. with a firewall and data backups. The user rights to information systems are limited through user group definitions: users may only access data that they need for their professional duties for the duration of their employment relationship.

## **13. Automated decision-making**

No automated decision-making takes place in the processing of employee data.

## **14. Rights of the data subject**

Data subjects have the right to withdraw their consent if the data processing is based on consent.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if the subjects consider that the data processing regarding them is in breach of data processing legislation in force.

Data subjects have the following rights under the EU's General Data Protection Regulation:

- a) Right of access to data concerning the data subject (article 15)
- b) Right to rectification of data (article 16)
- c) Right to erasure of data (article 17)
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20)

The data subject's rights involving the processing of personal data may be restricted in accordance with the EU's General Data Protection Regulation

*The liaison in matters related to the data subject's rights is the data protection officer; contact details in section 3.*