

**PRIVACY NOTICE  
EMPLOYEES****EU's General Data Protection Regulation (2016/679), Articles 13 and 14****Date: 27 September 2018****Updated: 18 November 2020****1. Data controller**

LUT University

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

Data controller's representative:

Name: HR and Finance Director Minna Sutela

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Data controller's contact:

HR Manager Jaana Punkka

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**3. Data protection officer**

Anne Himanka, Legal Counsel

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Email 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 preparation or implementation of an agreement.

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

The name, personal identity code, contact details, nationality, banking connection, degrees, employment terms, taxation information, possible debt recovery proceedings, and leaves of absence of employees are stored in the data file. For access rights, the employee's name and access authorisation and the validity period of the employee's access control key are stored in the access control system.

In addition, it is possible to store necessary usage permission information of employees for training and work task purposes.

Docents' names, personal identity codes, contact details, nationalities, degrees and teaching portfolios are saved in the file.

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**

Electronic forms service, personal data system, wage payment system, access control system, working time management system and document management system are used to process data. It is also possible to store employee information to network storage, when the user group of that storage is properly limited. Usage permission registers of devices can be put into sight on workspaces.

## **8. Data sources**

Data is mainly collected from the data subjects themselves. Also the Finnish Tax Administration, the Social Insurance Institution of Finland (Kela), execution authorities and the Finnish Immigration Service may provide information on data subjects. Employment terms 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.

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 (salary data), Mehiläinen (duration of employment relationship (necessary to determine the right to use occupational health care services), sick leaves), banks (salary payment data), TE Services (employment terms of employees from beyond the EU), Innolink (list of names and e-mails for the employee mood tracker). Responses to the employee mood tracker are anonymous – personal data cannot be connected to them.

Personal data is transferred in accordance with legislation in force to the following: the Finnish Tax Administration (annual notification), trade associations (notification of membership fee payments), pension insurance companies (pension insurance fees), the Social Insurance Institution, execution authorities. Wage payment data is also transferred to accounting.

For statistics: Statistics Finland's annual inquiry on personnel (personal identity code and organisational unit), Ministry of Education and Culture (person years).

Data may be disclosed to third parties for auditing.

For the purposes of projects, employee data may be disclosed to project investors and processed within the university to develop and monitor the university's activity.

In addition, personal data is transferred to the university's identity management system.

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

Data 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, encryptions and data backups. The data may be accessed only by those with a username for the system. Usernames are personal, and user rights to information systems are limited through user group definitions: each user may only access data that they need for their professional duties for the duration of their employment relationship. Printed documents are stored and safeguarded from external access.

University employees are bound by secrecy obligations under the Act on the Openness of Government Activities, section 23. In addition, university employees may not use the employer's professional and business secrets to their own advantage or disclose them to others (Employment Contracts Act, chapter 2, section 4). The employment contract has a non-disclosure clause. Secret information and its storage periods, archiving and disposal are defined in the university's filing plan.

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