

**PRIVACY NOTICE
APPLICANTS TO STUDIES
EU's General Data Protection Regulation
(2016/679),
Articles 13 and 14
Date: 19 October 2018
Updated: 18 March 2019**

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:
Director for International Affairs Janne Hokkanen
Phone +358 40 900 3617
E-mail: janne.hokkanen@lut.fi

Data controller's contact:
Service Manager Miia Vanhainen
Phone +358 40 848 0934
E-mail: miia.vanhainen@lut.fi

3. Data protection officer

Name: Anne Himanka, Legal Counsel
Address: LUT University, Yliopistonkatu 34, 53850 Lappeenranta, Finland
Phone: +358 50 564 4623
E-mail: dataprotection@lut.fi

4. Purpose of personal data processing

LUT processes personal data of applicants to studies in order to carry out student selections and admissions.

Personal data of students is collected to determine the eligibility of students, to evaluate student selections, to enable admission decisions, and to transfer admission data to a study administration data file.

In addition, LUT processes the personal data of students to manage admission data and compile statistics on it, and develop the admission process.

LUT may process student data also for the purposes of scientific research, accreditations, and study-related marketing communication.

5. Legal basis of personal data processing

The processing of student data is necessary on the grounds of public interest and the exercise of official authority vested in the controller.

When the data controller processes data on the grounds of compliance with a legal obligation, the data controller's activity is governed e.g. by the Universities Act (558/2009) and decrees issued based on it, the Government Decree on University Degrees (794/2004), the act on national student and degree registers (884/2017) and the Act on the Openness of Government Activities (621/1999).

6. Content of data file and storage period

The specific identifiers collected include the student's name, birth date, personal identity code, student identification number, national student OID code, and username. The background data collected includes the student's admission data, gender, nationality and languages (native and administrative language). The contact information collected includes the student's country of origin, address, phone number and e-mail addresses. In addition, in international student admissions, data on the student's right to study in Finland or the EU or the absence of the right is collected to determine the student's obligation to pay a tuition fee.

Admission-related data collected:

- applicant's name, student OID code, personal identity code or equivalent identification data, nationality, gender, native language, and necessary contact details
- programmes applied to
- data related to applying to study programmes
- data related to the grounds for admission
- applicant's education, degrees and professional experience
- health issues that affect the applicant's choice of profession (yes/no)
- applicant's hobbies
- admission results (entrance examination results and other admission-related data, e.g. admission requirements)
- acceptance of study place and enrolment
- applicant's consent or refusal to publish admission test results online
- applicant's consent or refusal to disclose his/her name and address for communication and marketing purposes
- data concerning the obligation to pay tuition fees and application for scholarships

Data concerning studies, which may include sensitive information, refers to personal entrance examination arrangements and corrections to admission decisions.

The storage periods of student data are defined in the university's filing plan.

7. Information systems employed

Student data is stored in the national Studyinfo applicant register. Data related to the scoring of separate application procedures is stored on the university's network drive.

From Studyinfo, data is transferred to e.g. the Oili and Oodi databases and the national Virta information system.

Admission decisions and related correction decisions contain personal data and are stored in the university's document management system.

8. Data sources

Students' personal data and other admission-related data are mainly provided by the applicants themselves during the admission process. In Studyinfo, also data on upper secondary school diplomas and degrees from Finnish higher education institutions from the SURE data file is connected to the applicants.

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.

Browser-based systems employ cookies in the processing of personal data.

10. Data transfer and disclosure

Information may be transferred from the data filing system to LUT's internal services as needed for purposes such as creating a student data file. Information from the applicant data file is transferred with the applicant's express consent within the university for marketing and communication purposes.

To comply with legislation, the university transfers information from its applicant data filing system:

- Information on study rights, enrolments, degrees and study attainments from higher education student data files is collected for centralised storage and use in the national VIRTIA higher education achievement register.
- The Ministry of Education and Culture produces documentation based on the university's student data file required for the evaluation, development, statistics and other monitoring and guidance of education and research through the VIRTIA register.
- To Statistics Finland.
- For scientific research. Anyone requesting data must tell the data controller the purpose for which the data will be used and give any other information necessary for determining whether the data may be disclosed, and if needed, a report on safeguards for data processing.
- To the higher education institution responsible for the field in question in the joint application process for MSc studies in technology, architecture or business.

In addition, data may be disclosed to other authorities, such as Immigration Services. The university observes good data processing practices and thus does not use external data processors.

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 data is processed in a way that does not compromise the students' right to privacy. Personal data is processed only by those whose duties require access to the data. The data may be accessed only by those with a username for the system. Usernames are personal and their user rights have been defined based on the person's duties. Printed documents are stored and safeguarded from external access. Software used for the processing of personal data is protected in accordance with the university's information security practices.

13. Automated decision-making

Automated decision-making takes place in the Studyinfo system with regard to joint application results, their publishing, and wait-listing. The decision-making is based on the decision regarding the university's student admission and on admission requirements decided by the university.

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); the right to erasure shall not apply if the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure prevents or significantly hinders the data processing
- 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.