

**PRIVACY NOTICE  
COMMUNICATIONS AND MARKETING  
EU's General Data Protection Regulation  
(2016/679), Articles 13 and 14  
Date: 5 July 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**

Brand and Communications Director Liisa Kuvaja

Phone: +358 40 722 5789

E-mail: liisa.kuvaja@lut.fi

Communications Specialist Jutta Luostarinen

Phone: +358 400 619 517

E-mail: jutta.luostarinen@lut.fi

Digital Marketing Specialist Jussi Reponen

Phone: +358 40 502 2651

E-mail: jussi.reponen@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**

The purpose of the communications data file is to enable communications on the research, activity and events of the Lappeenranta-Lahti University of Technology LUT and thus the university's societal interaction. The communications data file contains representatives of media, municipal administration and other key stakeholders.

The purpose of the marketing data file is to communicate about the university's education

opportunities and to market degree programmes. The marketing data file consists of potential applicants to degree programmes offered by the data controller.

In the data controller's online service lut.fi, the purpose of data processing is to track and analyse visitors and develop the online service.

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

The data processing is based on the data subject's consent (e.g. newsletter subscription, request to join a mailing list) or the pursuit of legitimate interests by the data controller (adding key stakeholder representatives to a mailing list, website visitor tracking and development of the website).

## **6. Content of data filing system and storage period**

The data subject's name, e-mail, IP address, and in the case of the communications data file, the data subject's employer or other organisation and phone number.

For the applicant marketing newsletter's data file, the data is stored for one year, and for other data files, the storage period is as long as the data controller's activities require.

## **7. Information systems employed**

The information systems employed for the processing of the marketing data file are Campaign Monitor (newsletter tool), Google Sheets, Zapier, Optinmonster, Adform and Facebook Pixel.

In addition, website visitors are tracked with Google Analytics and Google Tag Manager to analyse the use of web pages and their parts. Data collected with these tools is not connected to personal data or other cookie data.

## **8. Data sources**

Data is mainly provided by the data subjects themselves (newsletter subscriptions, requests to join mailing lists). Data is also collected from public-access information resources, such as online services of media and stakeholder organisations, and from databases of the National Board of Education.

## **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**

No personal data is disclosed to parties beyond the organisation.

As a rule, the processing of personal data is not outsourced to external data controllers. As an exception to the above, LUT employs an electronic newsletter service (Campaign Monitor) through which also student marketing newsletters are sent. The supplier of the electronic newsletter service processes e-mail addresses in LUT's applicant marketing data file. The

supplier of the newsletter service has agreed to comply with the EU's data protection legislation.

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

As a rule, personal data is not transferred beyond the EU or EEA with the exception of e-mail addresses on the server of the newsletter service provider employed in LUT's applicant marketing.

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

Only those whose professional duties so require have access to systems containing personal data (e.g. e-mail recipient lists, newsletter tool). Information security is ensured appropriately in accordance with the university's information security practices. No printouts or other forms of data that require physical safeguarding exist.

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

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

## **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.*