

**PRIVACY NOTICE
OPEN UNIVERSITY EDUCATION
EU's General Data Protection Regulation
(2016/679), Articles 13 and 14
Date: 27 September 2018
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1. Data controller

LUT University

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 contact

Data controller's representative:

Director for International Affairs Janne Hokkanen

Phone +358 40 900 3617

Email janne.hokkanen@lut.fi

Data controller's contact:

Mari Trinidad

Phone +358 40 766 1710

E-mail: mari.trinidad@lut.fi

3. Data protection officer

Anne Himanka, Legal Counsel

Phone +358 50 564 4623

Email tietosuoja@lut.fi

4. Purpose of personal data processing

LUT processes student data to implement and prove students' right to study and to arrange education. Student data is collected to enable students' studies.

In addition, open university education processes students' personal data for managing data on completed courses and compiling related statistics.

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 to comply 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 filing system and storage period

The specific identifiers collected include the student's name, birth date, personal identity code, and student identification number. The background data collected includes the student's gender, nationality and languages (native and administrative language). The contact information collected includes the student's country of origin, address, phone number and email addresses.

Data on studies includes study rights (credits and periods of validity), study attainments, registrations for examinations and courses, camera surveillance data on electronic examinations, study plans and other study guidance information, and data required for the arrangement of student services, including IT and library services.

Study-related data that may contain sensitive information include personal study arrangements and support in studies, and accounts of study-related irregularities and their consequences.

The storage periods of student data are defined by the National Archives of Finland. Some of the personal data is stored permanently.

7. Information systems employed

Students' personal data is stored in the student information system. Data is transferred from the system to e.g. the national Virta database on the grounds of compliance with a legal obligation, to the online learning environment used in teaching, the electronic examination system and the user management system maintained by the university's Information Services and Technology. Registration and payment data related to courses is stored in the university's e-commerce system.

8. Data sources

Open university students submit their personal data through the university's e-commerce system. Data on students of partner institutions is supplied by the partner institutions. If a registered student does not provide the necessary personal data, the student's right to study cannot be confirmed.

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 the university's internal services as needed for purposes such as creating user accounts.

To comply with legislation, the university transfers information from its student data file:

- Information on study rights, study attainments and available courses is collected for centralised storage and use in the national VIRTAs 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 VIRTAs register.
- To the employment office, Kela or an unemployment fund for the processing of unemployment benefit issues.
- 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.

In addition, data may be disclosed to other authorities. 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

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);
- 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.