

**Privacy Policy**

1. Controller	<p>University of Helsinki; University of Eastern Finland; University of Jyväskylä; University of Lapland; University of Oulu; University of Turku; University of Vaasa, Åbo Akademi; LUT University; Hanken School of Economics; University of the Arts Helsinki; Aalto University Foundation operating as Aalto University; Tampere University Foundation operating as Tampere University (each university is a controller in terms of the personal data in its own sub-register).</p> <p>LUT University P.O. Box 20, 53851 Lappeenranta, Finland Yliopistonkatu 34, 53850 Lappeenranta, Finland Tel. +358 294 462 111</p> <p>Business ID: 0245904-2</p>
2. Contact person for issues related to the register	<p>Data controller's representative: Director for International Affairs Janne Hokkanen Tel. +358 40 900 3617 Email: <a href="mailto:janne.hokkanen@lut.fi">janne.hokkanen@lut.fi</a></p> <p>Data controller's contact: Coordinator Elina Hannikainen-Himanen Tel. +358 40 573 3790 Email: <a href="mailto:careerservices@lut.fi">careerservices@lut.fi</a></p>
3. Data protection officer	<p>Anne Himanka, Legal Counsel Tel. +358 50 564 4623 Email: <a href="mailto:anne.himanka@lut.fi">anne.himanka@lut.fi</a></p>
4. Name of the register	<p>Register for career monitoring surveys at Finland's universities for graduates with a master's degree or discontinued bachelor's degree and for graduates with a doctor's degree.</p>
5. Purpose of processing personal data and legal grounds for processing	<p>The purpose of career monitoring surveys is to monitor the early career stages of university graduates and their situation in the labour market (five years for higher university degree graduates or discontinued bachelor's degree programme graduates, for example, nursery school teachers and pharmacists, and three years for doctors) and utilise the monitoring information in research, highlighting the early career stages of people with an academic education, the development of higher education and student guidance, as well as for offering information for potential students, current students and graduates for planning their own studies and career. In the</p>

## Career monitoring

EU's General Data Protection Regulation  
(EU 2016/679), Articles 12–14

	<p>career monitoring survey, this information is produced and used without identification information about the participants. This information is university-specific, for cooperation between the universities, with cooperation partners and generally for research through the Finnish Social Science Data Archive (FSD).</p> <p>Grounds for processing: Duties in accordance with public interest (evaluation and development of university education (sections 2 and 87 of the Universities Act (2009/558)) and production of related statistics). Decree of the Ministry of Education and Culture on Calculation Criteria for University Core Funding (119/2019).</p>
6. Data content of the register	<p>The background information of the career monitoring survey's target group (participants) will</p> <p>a) be recorded into the register: university, year of graduation, year of starting studies, gender, age, nationality, native language, field of science, study subject, degree level, scope of the degree, year of selection, home municipality, date of graduation, study municipality, duration of being a registered student, duration of actual studies, grade and grade scale of thesis work, possible date of death, moving out of Finland, day of the move, home municipality, study subject and faculty.</p> <p>b) Identification information: name, postal address and postal code, state, student identification code, survey ID, telephone number.</p> <p>c) Survey answers With regard to those who have filled in the career monitoring survey, these sections will be filled in with the information they have given concerning their position in working life, factors related to the quality of employment and the satisfaction of graduates concerning their studies from the perspective of working life.</p> <p>Information identifying the respondent (student number, name and contact information) and information about a possible date of death will only be used to send the survey and in order to link the above-mentioned background information.</p>
7. Regular data sources	<p>The background and identification information of the group of respondents will be gathered in a centralised manner from the national VIRTU study information service and, in supplementary parts, from the student information systems of universities (study subject, faculty). Address data will be supplemented using the Population Information System, the telephone number will be acquired from a separate telephone number supplier (Posti / Fonecta / other), and the email address from university's study and/or alumni register. Response data will be gathered from the answers of the participants. The participants have the opportunity to fill in a paper survey or an electronic</p>

## Career monitoring

EU's General Data Protection Regulation  
(EU 2016/679), Articles 12–14

	online survey. Data from the paper surveys will be recorded in the electronic system as subcontracted by the controllers of sub-registers.
8. Regular data transfers and recipient groups	<p>The processing of the register's personal data has been partly outsourced with a subcontract agreement:</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Yes; further information about outsourced processing:</p> <p>Based on subcontracting by the controllers of sub-registers, the register is processed by TUPA, statistical research service of the University of Tampere, and CSC - IT Center for Science Ltd.</p> <p>CSC - IT Center for Science Ltd selects the target group, enriches the contact information, creates the survey links and collects the online answers, as well as combines the material for reporting. CSC processes direct personal data during data collection and the survey data without the direct data when reporting the results. CSC discloses the personal data (contact information, background information and survey IDs) to TUPA so the survey and reminders can be sent and for analysis of the data.</p> <p>TUPA, statistical research service of the University of Tampere, coordinates the implementation of career monitoring and processes personal data in order to send the survey and for analysing and reporting purposes. TUPA discloses university-specific data to each university, to Aarresaari, career service network of Finnish Universities and to CSC for national reporting of national survey data. Data can be disclosed to partners (such as professional associations) for research purposes, excluding any personal data from which data subjects can be directly identified.</p> <p>In addition, data is also disclosed, without any identifiable personal data, to the Finnish Social Science Data Archive (FSD) for archiving and more detailed anonymisation for later research use. The data will be reported publicly so that no single individual can be identified from the results.</p>
9. Transfer of data outside the EU or EEA	<p>Will registered data be transferred to a third country or an international organisation outside the EU or EEA?</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, please specify:</p>
10. Register protection principles	A manual data -
	<p>B electronically processed data</p> <p>The anonymous electronic data from TUPA is stored in the online file storage of Student Services, to which only Student Services staff members have restricted access. All Student Services employees are obligated to secrecy</p>

## Career monitoring

EU's General Data Protection Regulation  
(EU 2016/679), Articles 12–14

	and may only use material in the online file storage related to their own duties.
11. Retention period for personal data or specification criteria for the retention period	<p>Identification information enabling the identification of respondents is retained in the register only until data is combined and later destroyed after the data has been processed.</p> <p>-TUPA will retain data from different years without any direct identification information for ten years in order to compile time series.</p> <p>-The university will retain data from different years without any direct identification information in its sub-register for five years in order to compile time series.</p> <p>The data will be stored in the Finnish Social Science Data Archive (FSD) anonymously, which means that it cannot be linked to individual people.</p>
12. Information about the existence of automated decision-making or profiling and information about the logic of processing and its significance for data subjects	<p>The registered data will be used for automated individual decisions, including profiling:</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, please specify:</p>
13. Rights of data subjects	<p>Under the EU's General Data Protection regulation (EU 2016/679), data subjects have the right to view their data, have their data rectified or erased, have the processing of their data restricted, object to the processing of their personal data, as well as the to lodge a complaint with the supervisory authority.</p> <ul style="list-style-type: none"> <li>- <u>Right to view data (right of access to personal data)</u> <ul style="list-style-type: none"> <li>o Data subjects have the right to know whether their personal data has been processed and what personal data concerning them has been recorded.</li> </ul> </li> <li>- <u>Right to have data rectified</u> <ul style="list-style-type: none"> <li>o Data subject have the right to claim that any erroneous, inaccurate or incomplete personal data be rectified or completed without undue delay. Furthermore, data subjects have the right to demand the erasure of any unnecessary personal data.</li> </ul> </li> <li>- <u>Right to have data erased</u> <ul style="list-style-type: none"> <li>o In irregular situations, data subjects have the right to have their personal data erased from the controller's register (right to be forgotten).</li> </ul> </li> <li>- <u>Right to restrict processing</u> <ul style="list-style-type: none"> <li>o In certain situations, data subject have the right to request that the processing of their personal data be restricted until their</li> </ul> </li> </ul>

	<p>data has been appropriately inspected and rectified or completed.</p> <ul style="list-style-type: none"><li>- <u>Right to object</u><ul style="list-style-type: none"><li>o Data subjects have the right, on grounds relating to their particular situation, to object to the processing of their personal data at any time.</li></ul></li></ul> <p>Requests to exercise the rights of data subjects must be sent to the university to <a href="mailto:anne.himanka@lut.fi">anne.himanka@lut.fi</a>.</p> <ul style="list-style-type: none"><li>- <u>Right to lodge a complaint with the supervisory authority</u><ul style="list-style-type: none"><li>o Data subjects have the right to lodge a complaint with the supervisory authority of their permanent place of residence or employment, if they consider that the processing of personal data is in breach of the GDPR (EU 2016/679). In addition, data subjects have the right to use administrative means of change management and other legal protection.</li></ul></li></ul> <p>Contact information:</p> <p><b>Office of the Data Protection Ombudsman</b> Visiting address: Ratapihantie 9, 6th floor, 00520 Helsinki Postal address: P.O. Box 800, 00521 Helsinki Tel.: +358 29 56 66700 Fax: +358 29 56 66735 Email: <a href="mailto:tietosuoja@om.fi">tietosuoja@om.fi</a></p>
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