PRIVACY NOTICE
Teaching Technology

EU General Data Protection Regulation (2016/679), Articles 13 and 14
Date: 28.5.2018
Updated: 26 May 2026, 3 August 2026

1. Controller

LUT University

Business ID: 0245904-2
Address: Yliopistonkatu 34, 53850 Lappeenranta
Phone: +358 29 446 2111

2. Controller's representative and contact

Controller's representative:
Director of Study Affairs Anne Himanka
Phone: +358 40 758 4925
Email anne.himanka@lut.fi

Controller's contact:
Eero Nukari, Educational Technology Manager
Phone: +358 45 668 6100
Email: eero.nukari@lut.fi

3. Data Protection Officer

Legal Counsel Ilona Saarenpää
Phone: +358 29 446 2111 (switchboard)
Email: dataprotection@lut.fi

4. Purpose of personal data processing

Personal data is processed for the following purposes:

- teaching arrangements
- service logins
- admission-related purposes
- support for learning and enabling assessing
- development of teaching

Collected log information is also used for

- solving technical problems
- investigating possible fraud or misconduct
- activity tracking
- learning analytics

The dissertation of a doctoral student is recorded for the purpose of documenting the degree process and ensuring legal protection.

5. Legal basis of data processing

The data controller processes personal data on the following legal grounds:

- a task carried out in the public interest
- the controller's legal obligation
- the legitimate interests of the controller or a third party (legal protection)

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 and storage periods

Moodle learning management system

- Personal data: first name, last name, email address, student identification number, username, faculty, department, phone number (staff) and other profile data provided by the user.
- Content uploaded by the user
- Log information collected from the activities by the user: date/time, first name, last name, description and name of the activity, context of the activity, IP address of the user
- Storage times for personal data during the studies and after graduation are defined in the Degree regulations of LUT. Study attainments are kept for at least 6 months after assessment, but maximum 36 months on courses via automation. Log information is kept for 12 months.

H5P content type Speak the Words

- Personal data: audio recorded by the user with a microphone
- The recorded audio is sent for processing to the Web Speech API, which transmits the audio to Google's service, where it is converted into text. The resulting text is compared with the correct text answer defined in the task.

CodeGrade

- Personal data: IP address, email, first name, last name, user's LMS ID (i.e., Moodle ID), the user's submission, personal data provided by the user themselves.

LUT MOOC learning management system

- Please check service's own Privacy Notices on the web page of the service

Zoom video meeting service

- Data of registered user: first name, last name, email address, IP address during meeting and technical system data
- Data of unregistered user: username given by the user, IP address during meeting and technical system data
- Data added to service profile by the user
- Statistical meeting data
- Storage time: Data of registered user can be deleted by request or after the right of use has ended.

EXAM - electronic examination

- Personal data: first name, last name, email address, student identification number, staff identification number, student ESI ID, student Peppi ID, username, organization
- Examination data: exam reservation, exam attainment, grade, feedback, content of the exam made by the user
- Storage time: Data of registered user can be deleted by request (within the required storage regulations). Study attainments are kept for 6 months.

Exam Moodle online exam system

- Personal data: first name, last name, email address, student identification number, username.
- Content uploaded by the user
- Log information collected from the activities by the user: date/time, first name, last name, description and name of the activity, context of the activity, IP address of the user
- Storage times for personal data during the studies and after graduation are defined in the Degree regulations. Study attainments are kept for 6 months. Log information is kept for 12 months.

Howspace facilitation service

- Personal data: first name, last name, email address and data added by the user
- Content uploaded by the user
- Log data (user activities)
- Storage time: Data of registered user can be deleted by request (within the storage regulations). The contents of an individual workspace are retained until the workspace is deleted.
- Data entered into Howspace workspace and user's name can be processed in the Microsoft Azure OpenAI service. These data are processed but not stored after processing (with the exception of possible handling of misuse, where data may be retained).
- When sending email messages from Howspace workspaces, personal data may be processed in the Mailgun service if AWS's email functions are not available. The delivery situation and email recipients are stored for a short time (maximum of 30 days) for troubleshooting and log information purposes. The source of personal data is the Howspace workspace from which email messages are sent.

Turnitin plagiarism-detection

- Personal data: first name, last name, email address
- Content uploaded by the user
- In the Turnitin Draft Coach service, in addition to the above, personal data includes also a Microsoft profile picture and basic organizational information
- Storage time: Data of registered user can be deleted by request (within the storage regulations).

EchoVideo lecture capture service

- Data of registered user: first name, last name, email address. User can add phone number and profile picture.
- Content uploaded to the service can be classified as personal data.
- Viewing statistics and student activities are stored and can be used for analyzing student activity.
- Storage time: Data of registered user can be deleted by request.
- The EchoVideo system is also used to record public examinations. The recording of the public examination is archived for a fixed period of time and deleted regularly within approximately six months. However, if the recording is needed in an administrative or legal process, it can be stored for the time required by these processes and after the end of the process in accordance with the university's records management plan.

LearnWise AI platform

- The LearnWise AI platform is available only in a limited number of pilot courses in Moodle during the autumn semester of 2026. If the platform is used in a course, students will be informed about its use in a transparent way and pilot teachers are trained to use AI in a responsible way.
- The LearnWise platform processes the following user data:
  - Identifying information: first name, last name, email address, student identification number, LTI user ID, username, role.
  - Interaction data: prompts, questions and chat messages the user sends to the AI assistant; the content the user uploads for assignments (files, documents, images, etc.); conversation metadata such as timestamps, session length and number of

turns. Course teachers and authorized service administrators have access to conversation data when necessary for teaching, educational development, user support, service administration, or troubleshooting purposes.
    - Teacher/trainer materials and data: If the AI Tutor is used in a course, LearnWise has access to content uploaded by the teacher. If the teacher uses AI-assisted assessment in the evaluation of a learning assignment, drafts related to feedback and grades, as well as modifications to those drafts, are stored in the service as part of the assessment process.
- Personal data is processed in the LearnWise service for the duration of the pilot. If the use of the service ends after the pilot, the data will be deleted in accordance with the service agreement. If the use of the service continues after the pilot, the data retention and deletion practices will be defined as part of the service's production use.

7. Sources of information

Moodle learning management system

- Personal data is transferred from the university's identity management system, or via HAKA registration, or by user's self-registration, or manually added.
- User can add personal information to the profile.

H5P content type Speak the Words

- The audio to be sent is recorded using the user's microphone when the user starts recording audio in the task.

CodeGrade

- Data is transmitted from Moodle when the user uses CodeGrade.
- CodeGrade sends the assessment information back to Moodle.

LUT MOOC learning management system

- Please check service's own Privacy Notices on the web page of the service

EXAM – electronic examination

- Personal data is transferred from the university's identity management system, or via HAKA registration. The information entered by the user is stored in the exam.

Exam Moodle online exam system

- Personal data is transferred from the university's identity management system, or via Shibboleth registration, or manually added.

Howspace facilitation service

- Personal data is added by the workspace owner or creator, or personal data is transferred from the university's identity management system when user logs in with Haka login method, or personal data is transferred from user's Google, Microsoft or Apple account when user logs in with Social Login method, or user provides personal data by themselves when joining the workspace, or personal data is transferred from Moodle if user joins a workspace from Moodle via LTI connection.
- User can add and change the profile data.
- User can upload content to the workspace.

Turnitin plagiarism-detection

- Turnitin assignment 2 activity: Personal data is transferred from Moodle to Turnitin when user clicks a Turnitin assignment 2 activity for the first time, or when another user adds the user to the activity.
- Turnitin Integrity (Turnitin which is integrated to Moodle's Assignment and Forum activities): Student's personal data is transferred from Moodle to Turnitin when a submission is made. Teacher's email will be transferred from Moodle to Turnitin if teacher makes a submission on behalf of a student.
- Turnitin LTI: Personal data is transferred from Moodle.
- Turnitin Draft Coach: Personal data is transferred from Microsoft account.
- User can submit content to the service.

Zoom video meeting service

- Personal data is transferred from the university's identity management system when the user logs in, or manually.
- User can add manually information to the profile.
- Log information is stored during meetings.

EchoVideo lecture capture service

- Personal data is transferred from Moodle or is created manually.
- Log information is formed by viewing.

LearnWise AI Platform

- Personal data is transferred from Moodle to the LearnWise service through integrations, including a Moodle plugin, LTI integration, and API interfaces. Interaction data and teacher-generated content are collected directly through Moodle activities.

8. 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.

9. 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 user accounts and reporting.

Personal data will be disclosed for processing to the service providers referred to in Sections 6 and 7.

In the EXAM system, personal data is processed by the service provider CSC, with whom the university has a service agreement. The data stored by EXAM is kept on servers managed by the service provider.

In addition, data may be disclosed to other authorities.

10. Data transfer and disclosure beyond the EU or EEA

No data is transferred beyond the EU or EEA with the exception:

- Turnitin can transfer information outside EU or EEA. You can find more information from Turnitin Privacy Policy.
- Howspace can transfer information outside EEA using a series of agreements with service providers based on the EU Commission's Standard Contractual Clauses or through other appropriate and available safeguards. You can find more information from Howspace Privacy Policy.

11. 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.

12. Automated decision-making

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

13. 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 protection 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)
f) Right to object (article 21).

Data subject's rights under the EU's General Data Protection Regulation do not automatically apply to all data processing.

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