

PRIVACY NOTICE STUDENTS

**EU's General Data Protection Regulation
(2016/679),
Articles 13 and 14
Date: 28 May 2018
Updated: 28 November 2024**

1. Data controller

LUT University

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2. Data controller's representative and contact

Data controller's representative:
Director of Study Affairs Anne Himanka
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Email: anne.himanka@lut.fi

Data controller's contact:
Head of Student Services Minna Ranta
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3. Data protection officer

Legal Counsel Ilona Saarenpää
Phone: +358 50 430 1072
E-mail: dataprotection@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 and graduation.

Moreover, LUT processes student data to manage and compile statistics on completed study attainments and degrees, to develop education, and to enforce physical safety and information security for members of the university community.

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

5. Legal basis of personal data processing

The data controller processes student data on the grounds of public interest and to comply with legal obligations.

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).

Processing of student feedback for the purposes of quality management of education is based on the data controller's legal obligation (the Universities Act 558/2009 2 § and 87 §) and the legitimate interest of the data controller. The legitimate interest is the quality assurance of the university's activities.

6. Content of data filing system 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 email addresses.

Study-related data includes rights to study (scopes and durations), enrolments for semesters, completed degrees, student union membership, completed study attainments, feedback from the student (e.g. course feedback), final theses, examination and course registrations, video surveillance data from electronic examinations, personal study plans and other data related to study guidance, internship and international student exchange data, data related to tuition fees and scholarships, and data necessary for the arrangement of student services, including IT and library services.

Study-related data that may contain sensitive information includes personal study arrangements and study-related support, the extension and reinstatement of study rights, and accounts of study-related irregularities and their consequences.

The storage periods of student data are defined by the National Archives of Finland or LUT's filing plan or records management plan. Some of the personal data is stored permanently.

7. Information systems employed

Student data is stored in the main operating system Sisu. Data is transferred from the system to e.g. the national Virta database on the grounds of compliance with a legal obligation, to the Moodle learning environment used in teaching, the electronic Exam system and the user management system maintained by the university's Information Services and Technology.

Student data is also processed in the Turnitin plagiarism detection system and Spark course feedback system that operate under the Moodle environment. Other information systems that collect personal data at LUT include e.g. a reporting database and repository and the Mobility-Online system for international student and staff mobility. Some decisions concerning students and containing their personal data are stored in the university's document management system.

8. Data sources

Students' personal data and data on their right to study and attendance are mainly transferred to LUT from the national Opintopolku (Studyinfo.fi) application system and the OILI enrolment

and registration service. Open university, continuing education and postgraduate students and students carrying out individual study modules provide their personal data themselves. If an enrolled student does not provide the necessary personal data, the student's right to study cannot be confirmed or recorded.

Personal and study-related data on incoming international exchange students is transferred to Sisu from the international Mobility-Online system.

The student's university email address is received automatically from LUT's Information Services and Technology.

The student feedback is collected from the students themselves.

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

Personal data may be transferred to LUT's internal services as needed for purposes such as creating user accounts and reporting. Certain information from the student data filing system is transferred with students' express consent to the Lappeenranta–Lahti University of Technology LUT Student Union, LUT's intranet search engine, the customer data file of the Lappeenranta Academic Library, the student card service, and employers for recruitment purposes. Students may change their consent to data disclosure in Sisu or by notifying Student Services.

LUT may also transfer information from its student data filing system based on the applicable legislation. Information on study rights, enrolments, degrees and study attainments from higher education institutions' student data registers is collected for centralised storage and use in the national VIRT A higher education achievement register, through which the data is made available to the student admissions register and the joint student admissions services of higher education institutions.

LUT discloses students' personal data directly or through the VIRT A higher education achievement register to the following parties:

- Ministry of Education and Culture, which produces documentation based on the university's student data register required for the evaluation, development, statistics and other monitoring and guidance of education and research;
- Statistics Finland;
- Social Insurance Institution of Finland (Kela) for processing higher education student financial aid matters and collecting student health care fees;
- The employment authority, the Social Insurance Institution of Finland (Kela) or an unemployment fund for processing of unemployment benefit issues.
- Data on its members to the Lappeenranta–Lahti University of Technology LUT Student Union for the election of representatives and the completion of statutory duties and the Frank Students service for the student card.
- Finnish Student Health Service for student health care;
- 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;

- Other Finnish higher education institutions, for example in connection with cross-institutional studies;
- EMREX service, through which students can transfer their chosen study data to a third party;
- ARVO – the education management information service to be used as background information for surveys created by the higher education institution for students;
- Study and degree data disclosure service (KOSKI) of the Finnish National Agency for Education;
- Finnish National Agency for Education's data collection on mobility periods (data on international mobility periods);
- Finnish Immigration Service;
- TUUDO mobile application;
- The Service Centre for Continuous Learning and Employment (SECLE) for carrying out its statutory duties. Through the VIRTATA higher education achievement register, SECLE is provided with information on training funded by SECLE as well as statistical data;
- Employment Fund for monitoring the studies of students who have received adult education allowance;
- OILI service for student enrollment and registration;
- Valvira - National Supervisory Authority for Welfare and Health (study attainment data related to the confirmation of qualifications);
- For follow-up surveys for monitoring, statistical and research purposes;
- Opin.fi service of the Digivision 2030 project of higher education institutions;
- HAKA trust network user identification system.

In addition, data may be disclosed to other authorities.

The University also uses external data processors in the processing of personal data (e.g. service providers of the electronic systems used).

The course feedback given by the student is processed by the persons responsible for education and its development in LUT. The following data processors, with whom LUT has concluded data processing agreements, are used in collecting and processing the course feedback:

- Studyo Oy
- LUT's field-specific student organizations (guilds)

11. Data transfer and disclosure beyond the EU or EEA

No data is 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 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.