

DATA PROTECTION NOTIFICATION CAREER MONITORING SURVEY

**EU's General Data Protection Regulation
(2016/679), Articles 13 ja 14**

Date: 28.9.2022

Updated: 4 March 2024

1. Data controller

LUT University (LUT)

Business ID: 0245904-2

Address: Yliopistonkatu 34, 53850 Lappeenranta, Finland

Tel. +358 294 462 111

Email: info@lut.fi

2. Data controller's representative and contacts

Data controller's representative:

Director for Study Services Anne Himanka

Tel. +358 50 564 4623

Email: anne.himanka@lut.fi

Data controller's contact:

Career Services Coordinator Elina Hannikainen-Himanen

Tel. +358 40 573 3790

Email: alumni@lut.fi

3. Data protection officer

Legal Council Ilona Saarenpää

Tel. +358 50 430 1072

Email: dataprotection@lut.fi

4. Purpose of personal data processing

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 and three years for doctoral graduates) 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 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).

5. Legal basis of personal data 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).

6. Content of data filing system and storage period

Career Monitoring Survey will be implemented using both a paper form and an electronic form. The electronic form is executed in the Arvo – Education Management Information Service maintained and developed by CSC – IT Center for Science Ltd. The Research Stats Service TUPA coordinates the collection of paper forms as well as combining the data.

The register includes identification and background information as well as the actual survey answers, which are collected by CSC and TUPA on behalf of LUT University. The information includes:

- a) *Form information: form code / number of the electronic answer and time of answering*
- b) *Identification information, which is not stored together with the survey answers. This information is only used for managing the target group and mailings and collecting the background information. The information is: first and last name, personal identification number, possible date of death, postal address and code, phone number and student number.*
- c) *Background information, which is stored with the survey answers: sex, nationality, mother tongue, age, postal code, country, habitual residence, habitual residence code, home town, home town code, university, degree level, educational sector (1/2/3), discipline, faculty, major, admission year, study town, study town code, duration of registration, duration of attendance, graduation month, scope of qualification, grade of the thesis (passed/failed), emigration from Finland, emigration date.*
- d) *Survey answers: The above mentioned information will be supplemented with the information the respondents give concerning their position in the work market, quality of employment and satisfaction to studies from the working life perspective.*

The respondents willing to have further information about where the survey results are published can give their email address at the time of response. The email addresses are stored separately from the survey results at LUT University.

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. LUT university will retain data from different years without any direct identification information for five years in order to compile time series. TUPA and CSC will retain data from different years without any direct identification information for ten years in order to compile time series. The data will be stored in the Finnish Social Science Data Archive (FSD) anonymously, which means that it cannot be linked to individual people

7. Information systems employed

CSC – IT Center for Science Ltd uses Arvo – Education Management Information Service in collecting the electronic responses.

8. Data sources

CSC collects the background information from VIRTU Study information service and completes it with information from Finnish Population Information System. Phone numbers are bought from a phone number services provider (Posti/Fonecta/other).

The respondents can choose if they wish to answer by paper or electronic form. On behalf of LUT University, the information from paper forms will be stored to the register by TUPA or electronically through the Arvo service. TUPA collects all the survey answers to the register and combines them to the background information.

LUT University delivers the supplementary information (e.g. major) which is not available from national VIRTAs service.

TUPA combines the registers of all Finnish universities into one national register. The information to the national register comes from University of Helsinki; University of Eastern Finland; University of Jyväskylä; University of Lapland; University of Oulu; Tampere University; 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.

The background and identification information of the target group will be collected centralized from national VIRTAs Study information service and it will be completed with supplementing information (e.g. discipline, faculty) from the study register of LUT University. The addresses will be obtained from the Finnish Population Information System by Digital and Population Data Service Agency, phone numbers from a phone number services provider (Posti/Fonecta/other) and emails from the study or alumni registers of LUT University. Survey responses will be received directly from the respondents.

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.

Cookies are used in the processing of personal data in alumni activities

10. Data transfer and disclosure

The processing of the register's personal data has been partly outsourced with a subcontract agreement.

Based on subcontracting by LUT University, the register is processed by The Research Stats Service TUPA and CSC – IT Center for Science Ltd.

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.

The Research Stats Service TUPA 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 and to CSC for national reporting of national survey data. By separate agreements, the data can be disclosed to cooperation partners (e.g. employee unions) for research purposes without any identifiable personal data.

In addition, data is also disclosed, without any identifiable personal data, to the Finnish Social Science Data Archive (FSD) for more detailed anonymisation and archiving for later research use. The data will be reported publicly so that no single individual can be identified from the results.

11. Data transfer and disclosure beyond the EU or EEA

Personal data is not transferred beyond the EU or EEA.

12. Safeguards for data processing

The paper responses will be mailed directly to TUPA for registering. After registration the paper forms will be destroyed by TUPA.

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 and may only use material in the online file storage related to their own duties.

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.