

## **PRIVACY NOTICE STUDENTS**

**EU's General Data Protection Regulation  
(2016/679),  
Articles 13 and 14  
Date: 28 May 2018  
Updated: 11 August 2021**

### **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 of Study Affairs Maija Kuiri  
Phone: +358 40 512 7425  
Email: maija.kuiri@lut.fi

Data controller's contact:  
Head of Student Services Minna Ranta  
Phone: +358 40 510 0597  
Email: minna.ranta@lut.fi

### **3. Data protection officer**

Legal Counsel Anne Himanka  
Phone: +358 50 564 4623  
E-mail: 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 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, 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).

## **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, 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. 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 collected for the Turnitin plagiarism detection system that operates 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.

## **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 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.

To comply with legislation, the university may transfer information from its student data filing system as follows:

- Information on study rights, enrolments, degrees and study attainments from higher education student data files is collected for centralised storage and use in the national VIRTATA 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 VIRTATA register.
- To Statistics Finland.
- To Kela – the Social Insurance Institution of Finland through the VIRTATA register or directly for the processing of student financial aid matters.
- To the employment office, 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 preparation of student cards.
- To the Finnish Student Health Service directly or through the VIRTATA register for student health care under the Primary Health Care Act.
- 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**

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 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.*