

PRIVACY NOTICE

EMPLOYEES

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

Date: 27 September 2018

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1. Data controller

Lappeenranta-Lahti University of Technology LUT
Business ID: 0245904-2

Lahti Campus
Mukkulankatu 19, FI-15210 Lahti
Phone: +358 294 462 111 (switchboard)

Lappeenranta Campus
Yliopistonkatu 34, 53850 Lappeenranta, Finland
Phone: +358 294 462 111 (switchboard)

2. Data controller's representative and contacts

Data controller's representative:
Name: HR Director Sanna Virtainlahti
Phone: +358 50 068 0986
E-mail: sanna.virtainlahti@lut.fi

Data controller's contact:
Name: HR Manager Virpi Ristimäki
Phone: +358 46 920 4835
E-mail: virpi.ristimaki@lut.fi

3. Data protection officer

Name: Legal Counsel Ilona Saarenpää
Phone: +358 294 462 111 (switchboard)
E-mail: dataprotection@lut.fi
Address: Box 20, FI-53851 Lappeenranta, Finland

4. Purpose of personal data processing

Handling matters related to employees' employment relationships and work duties and the quality assurance of the university's activities.

5. Legal basis of personal data processing

The personal data processing is based on

- the pursuit of legitimate interests by the data controller;
- the preparation or implementation of an agreement; or

- the data controller's legal obligation.

Processing of student feedback for the purposes of quality assurance of the university's activities 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 file and storage period

The name, personal identity code, contact details, nationality, banking connection, degrees, employment terms, taxation information, possible debt recovery proceedings, and leaves of absence of employees are stored in the data file. For access rights, the employee's name and access authorisation and the validity period of the employee's access control key are stored in the access control system. Docents' names, personal identity codes, contact details, nationalities, degrees and teaching portfolios are saved in the file.

In addition, it is possible to store necessary usage permission information of employees for training and work task purposes.

Course feedback from students is processed for the purposes of quality assurance of the university's activities.

Personal data is processed for statistical needs.

The data is stored permanently in accordance with legislation in force and with storage periods defined in the university's filing plan or records management plan.

7. Information systems employed

Electronic forms service, personal data system, wage payment system, access control system, working time management system, accounting and travel management system, travel agencies online-reservation system, credit card ordering system, document management system and feedback systems are used to process data. It is also possible to store employee information to network storage, when the user group of that storage is properly limited. Usage permission registers of devices can be put into sight on workspaces.

8. Data sources

Data is mainly collected from the data subjects themselves. Also the Finnish Tax Administration, the Social Insurance Institution of Finland (Kela), execution authorities and the Finnish Immigration Service may provide information on data subjects. Employment terms are provided by the liaison for employment relationship matters in the recruiting unit. Course feedback is received from the students of the course.

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.

10. Data transfer and disclosure

Personal data is disclosed to the following parties beyond LUT University: Certia (salary data), Terveystalo (duration of employment relationship (necessary to determine the right to use occupational health care services), sick leaves), banks (salary payment data), TE Services (employment terms of employees from beyond the EU), Vibemetrics (list of names and e-mails for the employee mood tracker). Responses to the employee mood tracker are anonymous – personal data cannot be connected to them.

Personal data is transferred in accordance with legislation in force to the following: the Finnish Tax Administration (annual notification), trade associations (notification of membership fee payments), pension insurance companies (pension insurance fees), the Social Insurance Institution, execution authorities. Wage payment data is also transferred to accounting.

For statistics: Statistics Finland's annual inquiry on personnel (personal identity code and organisational unit), Ministry of Education and Culture (person years).

Paid wages and collected taxes are informed to national income register.

Data may be disclosed to third parties for auditing.

For the purposes of projects, employee data may be disclosed to project investors and processed within the university to develop and monitor the university's activity.

Data on university credit cards is disclosed to the credit card company.

Travel reservation data is disclosed to the university's travel agency.

In addition, personal data is transferred to the university's identity management system.

The course feedback received by the teaching personnel 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

Data is not transferred beyond the EU or EEA.

12. Safeguards for data processing

The university's information security rules and guidelines apply to the management of information systems that process personal data. The information systems and their user interfaces are technically protected e.g. with a firewall, encryptions and data backups. The data may be accessed only by those with a username for the system. Usernames are personal,

and user rights to information systems are limited through user group definitions: each user may only access data that they need for their professional duties for the duration of their employment relationship. Printed documents are stored and safeguarded from external access.

University employees are bound by secrecy obligations under the Act on the Openness of Government Activities, section 23. In addition, university employees may not use the employer's professional and business secrets to their own advantage or disclose them to others (Employment Contracts Act, chapter 2, section 4). The employment contract has a non-disclosure clause. Secret information and its storage periods, archiving and disposal are defined in the university's filing plan or records management plan.

13. Automated decision-making

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

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)

The data subject's rights involving the processing of personal data may be restricted in accordance with the EU's General Data Protection Regulation.

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