

## **1. Controller**

LUT University

Business ID: 0245904-2  
Address: Yliopistonkatu 34, 53850 Lappeenranta  
Phone: 0294 462 111  
Email: info@lut.fi

## **2. Controller's representative and contact**

Controller's representative:  
Director of Study Affairs Anne Himanka,  
Phone: +358 50 564 4623  
Email anne.himanka@lut.fi

Controller's contact:  
Educational Technology Manager Marjaana Kareinen,  
Phone: +358 40 7171805  
Email: marjaana.kareinen@lut.fi

## **3. Data Protection Officer**

Legal Counsel Ilona Saarenpää  
Phone: +358 50 430 1072  
Email: dataprotection@lut.fi

## **4. Purpose of personal data processing**

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

Collected log information are also used for

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

## 5. Legal basis of data processing

The data controller processes personal 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 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 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 6 months, but maximum 36 months on courses via automation. Log information is kept for 12 months.

### *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.

### *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). Data and information are stored until the workspace is removed.
- Data entered into Super Chat functionality 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
- storage time: data of registered user can be deleted by request (within the storage regulations).

#### *Echo360 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. Can be used for analyzing student activity
- storage time: data of registered user can be deleted by request

## **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

#### *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.

#### *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 SSO 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*

- personal data is transferred from Moodle and stored while the profile is created when the service is used for submitting paper
- personal data of people who are in teacher role in Moodle course is transferred from Moodle to Turnitin when someone creates a Turnitin activity in the course
- user can submit content to the service

#### *Zoom video meeting service*

- Personal data is transferred from the university's identity management system, or manually
- user can add manually information to the profile
- log information is stored during meetings

#### *Echo360 lecture capture service*

- personal data is transferred from Moodle, or is created manually
- Log information is formed by viewing

## **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.

In addition, data may be disclosed to other authorities. The university observes good data processing practices and thus does not use external data processors

## **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 EEA using Standard Contractual Clauses (EU directive 95/46/EY), that fulfill the demands of every EU member
- 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

## **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 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