

**PRIVACY NOTICE**  
**LUT University/Communications and Marketing**  
**EU's General Data Protection Regulation (2016/679),**  
**articles 13 and 14**  
**Date: 22 July 2021**  
**Updated: 28 February 2024**

### **1. Data controller**

Lappeenranta–Lahti University of Technology LUT

Business ID: 0245904-2  
Phone: +358 29 446 2111

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Yliopistonkatu 34, FI-53850 Lappeenranta

Lahti Campus  
Mukkulankatu 19, FI-15210 Lahti

### **2. Data controller's representative and contacts**

Brand and Communications Director Liisa Kuvaja  
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Communications Manager Terhi Kuisma  
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Digital Strategist Kaisa Jaakkola  
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### **3. Data protection officer**

Name: Legal Counsel Ilona Saarenpää  
Phone: +358 50 430 1072  
Email: [dataprotection@lut.fi](mailto:dataprotection@lut.fi)

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

The purpose of the communications data file is to communicate about the research, activity and events of the Lappeenranta–Lahti University of Technology LUT to fulfil the institution's societal interaction mission. The communications data file consists of representatives of media, municipal decision-makers and other key stakeholders.

The purpose of the marketing data file is to communicate about the university's education opportunities and market its degree programmes. The marketing data file consists of data subjects who have given their consent to marketing.

#### **5. Legal basis of data processing**

The processing of personal data is based on the data subject's consent (e.g. newsletter subscription, request to join a mailing list) or a legitimate interest of the data controller (adding key stakeholder representatives to a mailing list).

#### **6. Content of data file and storage period**

The person's name, email address, and in the communications data file, the data subject's employer or other organisation and phone number.

For the applicant marketing newsletter, data is stored for one year, and other data is stored for as long as necessary for the data controller's activities.

#### **7. Information systems used**

The information systems employed in the processing of the marketing and communication data file are the Lut.fi online service, Campaign Monitor (newsletter tool), Google Sheets, Zapier, Optinmonster, Unibuddy and Meltwater.

Service providers used by Communications and Marketing are granted access to the personal data only to extent specified in this privacy statement.

#### **8. Data sources**

As a rule, data is collected from the data subjects themselves (newsletter subscriptions, requests to join mailing lists). Data is also gathered from public-access sources, such as websites of media outlets and stakeholder organisations, and databases of the Finnish National Agency for Education. Data is also gathered from the university's online service.

#### **9. Use of cookies**

Browser-based data filing 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, but this may prevent the system from operating correctly.

#### **10. Data transfer and disclosure**

As a rule, personal data will not be disclosed beyond the organisation. External service providers used by Communications and Marketing and supporting data processing are committed to observing the EU's data protection legislation.

Personal data can be transferred or used by Communications and Marketing only if the data subject has given his or her consent.

## **11. Data transfer and disclosure beyond the EU or EEA**

As a rule, personal data will not be transferred and disclosed beyond the EU or EEA. Service providers used by Communications and Marketing may, in some cases, use servers beyond the EU or EEA, and therefore, data may be transferred. The service providers are committed to observing the EU's data protection legislation. Google Sheets and Campaign Monitor store tracking data on their servers, which may be located beyond the EU or EEA.

## **12. Safeguards for data processing**

User rights are granted only to employees whose job description requires access to the personal data file. The data is protected by observing the data protection regulations of the university. No printouts or other documents that require physical protection exist.

## **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). The right to erasure shall not apply if the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure prevents or significantly hinders the data processing.
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20).

Data subjects' 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.*