

PRIVACY NOTICE International internship EU's General Data Protection Regulation (2016/679), Articles 13 and 14 Date: 29 June 2021

### 1. Data controller

**LUT University** 

Business ID: 0245904-2

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## 2. Data controller's representative and contacts

Data controller's representative: Director of Study Affairs, Ms. Maija Kuiri Tel. +358 40 5127 425 E-mail maija.kuiri@lut.fi

Data controller's contact person: Service Manager Otto Moilanen Tel. +358 50 477 8313 E-mail otto.moilanen@lut.fi

Data controller's contact person from 31.5.2022 Service Manager Mari Tuukkanen Tel. +358 40 741 8842 E-mail mari.tuukkanen@lut.fi

# 3. Data protection officer

Anne Himanka, Legal Counsel Address LUT University, Yliopistonkatu 34, FI-53850 Lappeenranta, Finland Tel. +358 50 564 4623 E-mail tietosuoja@lut.fi

# 4. Purpose of personal data processing

The practical guidance, contract management, grant payment, and user account applications of incoming and outgoing international interns, and international mobility statistics.

### 5. Legal basis of personal data processing

The lawfulness of the data processing is based on legitimate interests pursued by the controller or a third party.

### 6. Content of data filing system and storage period

Data collected on outgoing interns:

- Student: given name, family name, student ID number, personal identity code, gender, nationality, phone number, e-mail address, address in Finland, education level, degree programme
- Receiving company: name, department, address, web site, number of employees, contact persons and their contact details
- Internship information: job title, internship period, weekly working hours, working language, internship programme, learning outcomes, follow-up and reporting plan, pay for the internship period
- Insurance: who took out the insurance, details of liability, accident and health insurance
- Payment details: grants awarded, account owner, bank, BIC, account number
- Other: type of exchange, Erasmus+ grant months, skill level in working language

Data collected on incoming interns:

- Student: given name, family name, birth date, gender, nationality, phone number, e-mail address, address in country of origin and in Finland, education level and discipline
- Sending organisation: name, department, address, contact people and their contact details
- Internship information: job title, internship period, weekly working hours, working language, internship programme, learning outcomes, follow-up and reporting plan.
- Insurance: who took out the insurance, details of liability, accident and health insurance
- Other: type of exchange, skill level in working language

The data is updated continuously. Contracts and related documents are stored for ten years after the expiration of the contract. The storage period is determined by the archiving requirements of Erasmus+ and LUT's filing plan.

## 7. Information systems employed

The data is stored on the Student Services online file storage.

#### 8. Data sources

The main data sources are the data subjects themselves. For outgoing students, the sources include the LUT Grant Application Form, a transcript of student records, an up-to-date study plan, a work certificate and an internship report. For incoming students, they include a CV, application letter and possible transcript of records.

The information on outgoing students is supplemented by their internship supervisors and the receiving organisation. The Erasmus+ Grant Agreement (only for Erasmus+ grant recipients), Erasmus+ Learning Agreement (only for Erasmus+ grant recipients), Startuplifers Grant Agreement (only for Startuplifers grant recipients), and LUT Travel Grant Agreement (only for LUT travel grant recipients).

The information on incoming students is supplemented by their internship supervisors and the sending organisation. The Erasmus+ Learning Agreement (only for Erasmus+ grant recipients) or LUT Internship Agreement.

### 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 properly.

No cookies are used in the processing of personal data in this case.

### 10. Data transfer and disclosure

A copy of the internship agreement (Erasmus+ Learning Agreement or LUT Internship Agreement) is sent to the student and the receiving/sending organisation. A grant payment form is sent to Certia online via mepco. Erasmus + mobilities are reported to the European Commission's Mobility Tool and the student's e-mail address is entered into the European Commission's Online Linguistic Support language training service. For statistical purposes, data is transferred anonymously to Virta. Other data is not disclosed beyond LUT.

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

If the sending organisation is located outside the EU or the European Economic Area, a copy of the internship agreement will be sent there. Other data will not be transferred or disclosed beyond the EU or EEA.

## 12. Safeguards for data processing

Only Student Services staff members have access to the Student Services online file storage. 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); 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).

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