

**PRIVACY NOTICE**  
**Continuing professional education**  
**EU's General Data Protection Regulation (2016/679),**  
**Articles 13 and 14**  
**Date: 22 May 2018**  
**Updated 18 March 2019**

**1. Data controller**

LUT University

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

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**3. Data protection officer**

Anne Himanka, Legal Counsel

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**4. Purpose of personal data processing**

Organising continuing professional education at LUT University, documenting related student participation, and marketing continuing professional education.

Participants in continuing professional education are included in the continuing professional education data file.

The collaboration network data file consists of instructors used in continuing professional education, sponsors, parties providing facilities, and media agency contacts.

The direct marketing data file contains important target groups to whom continuing education can be offered (e.g. experts, managers, HR and training liaisons in companies).

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

The processing of personal data of participants in continuing education is based on a contractual relationship.

The legal basis of the processing of course data in the student data file is compliance with a legal obligation: the act on national student and degree registers.

Data processing related to the cooperation network data file that enables the organisation of continuing professional education is based on the pursuit of legitimate interests by the data controller. Cooperation networks include e.g. instructors of continuing education courses, sponsors, those providing education facilities, and media agencies.

A data file for the direct marketing of continuing professional education is maintained, and the grounds for processing personal data in it are the pursuit of legitimate interests by the data controller or consent by the data subject. The direct marketing data file contains public-access data on HR staff of companies, experts and managers to whom continuing professional education could be offered.

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

Data stored on continuing professional education participants: name, employer, birth date/personal identity code, gender, language, nationality, special diet, phone number, e-mail address, street address, city, education background, student status at LUT, student identification number, whether the person is an LUT alumnus/alumna or not, graduation date, degree and faculty at LUT, job title, department, organisational level, price list, payment terms, marketing consent, primary marketing channel, interest in products, membership in marketing list, mode of contact, interests, participation in training and cancellations.

Data stored on continuing education cooperation network: name, employer, birth date/personal identity code (instructors), gender, language, nationality, special diet (instructors), phone number, e-mail address, street address, city, education background, job title, department, organisational level, expertise (instructors), LUT as employer (instructors), marketing consent, membership in marketing list, mode of contact, contact regarding training (instructors).

The direct marketing data file stores the following data: name, employer, gender, language, nationality, phone number, e-mail address, street address, city, education background, whether the person is an LUT alumnus/alumna or not, job title, department, organisational level, price list, payment terms, marketing consent, primary marketing channel, interest in products, membership in marketing list, mode of contact and interest in training.

Data that is entered into the student register is stored permanently.

Other data is stored for as long as necessary for continuing professional activities. The information in the data files is reviewed regularly, and data that is obsolete or data that a data subject wants erased will be removed if possible under relevant legislation.

## **7. Information systems employed**

Customer data system on a server of LUT University.

## **8. Data sources**

The data is mainly collected from the data subjects themselves. For direct marketing, data is collected from the public web sites of companies, company registers (commercial actors) or catalogues and address lists of fair and event organisers.

## **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.

Browser-based systems employ cookies in the processing of personal data.

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

Personal data is not disclosed to parties beyond LUT University.

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

Data is not transferred beyond the EU or EEA.

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

Only those who need to process the data for their work have access to the continuing professional education customer data system. The customer data system is located on a server of LUT University, and its security is sufficiently safeguarded. If participant lists are temporarily stored on the hard drive of a continuing education staff member, also their security is safeguarded according to the university's 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.*