

**PRIVACY NOTICE**  
**Publications**  
**EU's General Data Protection Regulation**  
**(2016/679), Articles 13 and 14**  
**Date: 16 May 2018**  
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**1. Data controller**

LUT University

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

Name: Director of Library Ulla Ohvo

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Name: Development Manager Iris Tahvanainen

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**3. Data protection officer**

Name: Anne Himanka, Legal Counsel

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**4. Purpose of personal data processing**

Personal data is processed for the purpose of maintaining the LUTPub publication repository. LUTPub is meant for the online storage of final theses and scientific publications.

Students submit their final theses to the LUTPub repository. The library staff uploads doctoral dissertations in the publication repository. The university's researchers submit their scientific papers, conference papers and research materials to the repository. The LUT Scientific and Expertise Publications series is published online in LUTPub.

LUT has agreed to purchase a network service from the National Library of Finland (Doria services). LUTPub is located on the National Library's server, and the National Library provides services related to the registration of persons submitting information to LUTPub. The National Library's privacy notice for Doria is available here: <https://www.kiwi.fi/display/Julkaisuarkistopalvelut/Dorian+tietosuojaseloste>.

In accordance with the service agreement, LUT is the data controller and the National Library is the data processor.

## 5. Legal basis of personal data processing

The data processing is based on the data subject's consent. With regard to final theses, the processing is also based on the data controller's compliance with a legal obligation (Act on the Openness of Government Activities 621/1999).

## 6. Content of data file and storage period

The following data is stored regarding the data subject:

- Name
- E-mail

The SimpleStats analytics software processes the following data concerning the data subject:

- IP address
- Documents downloaded from the IP address

If Google Analytics needs to be used, the following data is collected:

- Browser type and version (e.g. Internet Explorer 11)
- Language version of the browser (e.g. Finnish)
- Operating system (e.g. Windows 10)
- Brand, type and model of the device
- Type of screen
- URL (previous page visited)
- Downloaded sites
- Clicks
- Country, region and city from which the request was sent
- Search operators

Also materials and descriptions submitted to the system may include personal data or names and photos of persons. Persons' names refer to authors of materials in the repository and authors referenced.

The data subject's data is made anonymous after 12 months of the latest logon. After that, the data subject can no longer log on to the service, but the data he/she has submitted and handled will remain in the service. If the person has had wider user rights to the service due to his/her professional duties, they will be removed after the end of the employment relationship.

The LUTPub system collects log data. Log data is stored for no more than five years. Log data needs to be stored in case of problems or information security breaches. In addition, log data is used for compiling statistics.

## 7. Data sources

Registered users submit their publications and data to the LUTPub service themselves or request that the library do it for them.

## **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.

Cookies are used in the processing of personal data in this system.

## **9. Data transfer and disclosure**

The data is processed in the National Library of Finland, with which LUT has concluded a service agreement.

The National Library will not disclose data to third parties. The LUTPub software DSpace has technical interfaces through which the EU's OpenAire publication portal obtains descriptions of materials and open-access publications from LUTPub.

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

As a rule, data is not transferred, but social media buttons can be connected to the service. Through them, information concerning the use of the service may be conveyed to service providers beyond the EU or EEA.

## **11. Safeguards for data processing**

The data is only stored in electronic form. The National Library implements its own security measures to ensure the security of data stored in LUTPub. Only employees responsible for the maintenance of the service have access to the log data. Also employees of the organisation who are responsible for the processing of the data have access to the data of registered users. These employees are identified based on a username and password.

## **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); 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.*