



Privacy Notice: processing the personal data of library patrons

This is a privacy notice, which is based on articles 13 and 14 of EU's General Data Protection Regulation.

Controller

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Person in charge and contact persons

Marita Ahola, Head of Information Services

Contact information of the Data Protection Officer

Harri Kilpiö, Data Protection Officer (Turku UAS)

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Please contact in all data protection related matters: tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing personal data

The library patron register which contains personal data is used for managing the library's patron relations: management and maintenance of borrowing services, access control of the self-service library and statistics. The statistics do not contain personal data. In addition, the register is used for communications between the library and the patron, for example reporting the arrival of reserved materials and sending due date notifications.

Legal basis for processing personal data

The library obtains and offers to its patrons electronic and printed materials, supports research and teaching in different fields and provides assistance in the progress of studies and professional development.

The library patron concludes an agreement on using the library's borrowing services, which presents itself as the right to use the library card. Thus, personal data is processed for the performance of an agreement or to take steps prior to entering into an agreement, whereupon the legal basis for processing personal data is the General Data Protection Regulation, article 6, paragraph 1, subparagraph b.

Article 6, section 1, sub-section f of the General Data Protection Regulation serves as the legal basis for processing personal data in the transfer of the data of Turku UAS' students and employees.

Legitimate interests of the data controller or third party

Processing of personal data is necessary for the purposes of the legitimate interests pursued by the controller. The controller's legitimate interest is based on a relevant and appropriate relationship between the data subject and controller, which is a consequence of that the data subject is a student or employee at Turku UAS and when the processing takes place for purposes which the data subject can reasonably have expected at the time of and in connection with collecting the personal data.

Processed categories and storage times of personal data

The categories of personal data to be processed cover any students and employees of Turku UAS and external people and organizations registered as library patrons. Receiving a library card signifies registration as a library patron.

The patron data file contains

- the patron's personal and address information (name, postal address, telephone number, email address, social security number or, if unavailable, date of birth)



- information related to the library patron relationship (library card number, PIN code, patron and statistics group, information on current loans and reservations and information on fees and procedures related to any failure to return loans, information on the date and time of patron events, period of validity of the patron relationship)
- eduPersonPrincipalName (ePPN) of Turku UAS' students and staff.

Patron-specific information related to borrowing, payments and maintenance of patron data is removed after two years of the event.

The data of patrons, excluding the staff of Turku UAS' library and the libraries with which Turku UAS has entered into an agreement, will be automatically removed from the register if the patron has not borrowed anything in over three years and the patron has no unreturned loans or unpaid fees.

The name, social security number, postal address, telephone number, email address, ePPN, patron and statistics group and date of graduation are sent and updated from the student records of Turku UAS to the patron data file of the library. Transferring the students' data expedites the library card application process and reduces risks related to manual input of information.

Transferring student data to the patron data file of the library in advance before they become library patrons is considered a sensible, economic manner to implement the library's duty of serving the public interest. Article 6, section 1, sub-section f of the General Data Protection Regulation serves as the legal basis for processing personal data in said data transfer.

Any information on the students received from the student records is automatically removed after one year of the student's graduation if the student has not registered as a library patron within that period.

The name, date of birth, postal address, work email address, ePPN, patron and statistics group and the end date of the employment relationship of those who have registered in the library's patron register and are in a full-time employment relationship are updated in the library's patron register from Turku UAS' HR system. With updating the information, the patron data stay up to date. Article 6, section 1, sub-section f of the General Data Protection



Regulation serves as the legal basis for processing personal data in updating the information.

Any electronically submitted forms arrived at borrowing services are removed from the e-form system annually and at regular intervals from the Service Desk system.

Information related to invoicing unreturned material is stored in Turku UAS' systems for 10 years.

Regular information sources

Information provided by the patron, information received in connection with borrowing materials and the student records, HR system or other systems of Turku UAS.

Address information can be obtained from public address and telephone number services or the Digital and Population Data Services Agency.

Receivers or receiver groups of personal data

Personal data is processed by library employees and employees in the libraries with whom a cooperation agreement has been drawn.

The supplier of the library system of Turku UAS, Ex Libris, can access the patron data file. An agreement has been made with the supplier on processing the personal data.

The patron's data is transferred from the library system to the Finna customer interface when the patron logs in Finna. The patron data file of Finna is maintained by the National Library (University of Helsinki). In addition, data is transferred to the supplier of the online payment service when the patron makes payments in the Finna customer interface. Data is also transferred to devices intended for patron use and required in producing library services, and the self-service library system.



In invoicing and collecting debts for unreturned materials, personal data is disclosed to Turku University of Applied Sciences' Financial Administration and the debt collection agency utilized by Turku UAS.

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

The information is not disclosed outside the EU or EEA.

Principles of data protection

The data is accessed only by people whose tasks require access to the data. Access to the service is limited with user IDs and user rights. The staff is under an obligation of confidentiality.

The information in the patron data file is located on servers maintained by Ex Libris and Ex Libris is responsible for the information security of the server.

Data subjects' rights

According to the General Data Protection Regulation, the data subject has the right:

- to receive information on the processing of their personal data, unless otherwise regulated by the law
- to request for access to their personal data and rectification regarding incorrect or insufficient information
- to erase their data (not applied, if the basis for processing is compliance with a legal obligation or performance of a task conducted in the public interest)
- to restrict the processing of their data
- to object to the processing of their data, if the basis for processing is general or legitimate interest



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- to request the transfer of data they have submitted themselves from one controller to another, if the basis for processing is consent or agreement
 - withdraw the consent they have given
 - notification obligation of the controller on the rectification/erasure/restricting of processing of personal data
 - not to be subject to automated decision-making (the data subject may allow automated decision-making by their consent)

Data subjects may exercise their rights by contacting the contact person mentioned in the privacy notice or the Data Protection Officer. More information on data subjects' rights is provided by the contact person and/or Data Protection Officer.

If processing the data does not require identifying the data subject without additional information or the controller cannot recognize the data subject, the right to inspection, rectification, data erasure, restriction of processing, obligation to report and transmittal is not applied.

You have the right to file a complaint with the Data Protection Ombudsman's office, if you consider that valid data protection legislation has been breached in processing your personal data. The contact details of the DPO can be found in the beginning of the privacy notice. All requests are processed on a case-by-case basis.