

## Privacy notice for the students of Turku University of Applied Sciences

This privacy notice describes how the personal data of the students at Turku University of Applied Sciences is processed and what rights the students have on their own data.

This notice applies the degree students at Turku University of Applied Sciences, students at the Open UAS, students in specialization education, students with a separate right to study and incoming exchange students. In addition, where applicable, people who have had one of the abovementioned rights to study.

In order for Turku University of Applied Sciences to carry out its educational task – arrange tuition, collect and maintain student and degree data and offer student services – TUAS has to process different kinds of personal data, from which students can be identified. This renders the student a data subject. Turku University of Applied Sciences is a data controller which controls the processing of personal data for a defined purpose.

In addition to processing personal data related to teaching and studies, the data of students may, on a case-by-case basis, be processed in other processing entities of personal data. These include, for example, access control and video surveillance related to TUAS' premises. These are described in more detail in the privacy notices of the respective processing entities, available on TUAS' website and in Messi. The purpose is that this privacy notice provides the reader an overview of the processing of their personal data, and that they know where they can find more specific information on each processing entity.

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## Contact information of the Data Controller

Turku University of Applied Sciences Ltd  
Joukahaisenkatu 3, 20520 Turku  
Telephone exchange +358 (0) 2 263 350  
[kirjaamo@turkuamk.fi](mailto:kirjaamo@turkuamk.fi)

### Person responsible for the student data register:

Head of Student Services Ismo Kantola, [ismo.kantola@turkuamk.fi](mailto:ismo.kantola@turkuamk.fi)

### Deputy for the student data register:

Tessaliina Iltanen, [tessaliina.iltanen@turkuamk.fi](mailto:tessaliina.iltanen@turkuamk.fi)

In questions related to the student data register and this privacy notice for students, please contact primarily the service channel of student affairs: send email to [opintoasiat@turkuamk.fi](mailto:opintoasiat@turkuamk.fi). You can send, for example, service requests related to rectification of faults and for using the right of access and inspection.

In processing service requests, several different information systems are utilized, such as email and a service request management system. Processing personal data in connection with service requests is described in a separate privacy notice, which is available on the data protection page of TUAS:

<https://www.tuas.fi/en/information/>

### Data Protection Officer:

Please contact this service address in all data protection related matters: [tietosuoja@turkuamk.fi](mailto:tietosuoja@turkuamk.fi)

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

DPO's email and phone number, please visit: <https://www.tuas.fi/en/information/>

## Purpose of and legal basis for processing personal data

The purpose of processing student and study data is to maintain the basic information on students and study information, producing different study-related extracts, certificates and reports, and data transfers to authorities. The data in the student data register is maintained to safeguard the rights and interests of students.

Data is processed to carry out and organize the statutory, public educational task of the University of Applied Sciences and to award degrees. The other purposes of use of the data are compiling statistics, administration and planning at the University of Applied Sciences and providing service for the student union for it to carry out its statutory task. The data can also be utilized in quality management of the University of Applied Sciences, such as in carrying out the student barometer survey.

The student information, information on the right to study, enrolment information for each academic year, information on completed degrees and studies, and information on international mobility in universities of applied sciences' student data registers are collected for centralized storage and use in the national Higher

Education Achievement Register (VIRTA), through which this data content is offered in a secure manner with a technical data link for the use of the admissions register and the joint admission service of higher education institutions (Act 1058/1998, chapter 1 a).

The justification of processing personal data related to student and study information is necessary for compliance with a legal obligation to which the controller is subject (General Data Protection Regulation, Article 6, Section 1, Sub-section c) as provided in the Act on Universities of Applied Sciences (932/2014) and for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (General Data Protection Regulation, Article, 6, Section 1, Sub-section e).

The following legislation also applies universities of applied sciences

- the Universities of Applied Sciences Decree (1129/2014)
- the Act on National Education and Degree Registers (884/2017)
- the Administrative Procedure Act (434/2003)
- the Administrative Judicial Procedure Act (586/1996)
- the Act on the Openness of Government Activities (621/1999)
- the Decree on the Openness of Government Activities and on Good Practice in Information Management (1030/1999)
- the Statistics Act (280/2004)
- the Act on Financial Aid for Students (65/1994)
- the Unemployment Security Act (1290/2002)
- the Decree on Financial Aid for Students (869/2017)
- EU's General Data Protection Regulation
- the Data Protection Act (1050/2018)

## Groups of processed personal data

Turku University of Applied Sciences only processes data which is necessary to carry out the study administrative task of the University of Applied Sciences and data which is necessary for the planning, implementation, monitoring and evaluation of its operations. These include:

### 1. Information on applicants

- information on applicants imported from Oili (<https://confluence.csc.fi/display/OILI/Rekisteriseloste>)
- personal information of students (first names, calling name, last name, social security number, student ID)
- address information
- mother tongue and contact language
- nationality
- background education
- information related to the study option and degree programme

- enrolment and payment information
- special arrangement requests for the entrance examination and justifications
- information on clarifications regarding unsuitability for studies and related solutions (SORA)

## **2. Information on students**

- student number, student ID
- last name, first names, calling name
- date of birth, social security number, gender
- nationality, mother tongue, place of residence, place of domicile
- basic education, language of previous education, contact language
- contact information (address, postal code, post office, email, telephone number)
- data distribution permissions
- additional information on the student

## **3. Information on studies**

- student number
- degree programme, type of education, specialization
- degree, degree title, field of education, education categorization
- required extent of studies
- full-time/part-time studies
- period of the right to study, presence and absence maximums
- campus
- arrival group, other groups
- instructors
- qualifications
- specifiers of the right to study
- certificate entries, individual certificate entries
- additional information on the right to study, information on transfer students
- liability to pay the annual tuition fee and information on the payment of the annual tuition fee

## **4. Information on being present/absent**

- semester enrolment information for each semester
- used periods as present/absent
- applications for the restoration of the right to study and for the extension of study time and their processing information
- information on the continuation and restoration of the right to study
- information on the resignation from studies
- information on graduation

## **5. Information on the student's individual study plan**

- required extent, completed extent, extent to be completed

- the curriculum used as the basis for the individual study plan
- studies selected for the individual study plan
- timing of the studies in each semester
- enrolments to studies
- study attainments
- comments on the individual study plan, tasks
- communication between the student and instructor
- transcript of records
- application for the degree certificate and its processing information

## **6. Information on study attainments**

- name, extent, grade, date of completion, date of registration, person who has recorded the study attainment, keyboarder
- method of completion, language, place of completion, municipality, projectization, RDI and virtual credits
- accredited studies and exemptions
- title of thesis, grade, date of completion, instructor

## **7. Information on international mobility**

In addition to information on studies, the following information:

- contact information of next of kin: last name, first name, email address, telephone number
- account information (outgoing exchange students and degree students obligated to pay the annual tuition fee)
- start and end date of the mobility period
- country of mobility period
- mobility programme
- mobility direction
- type of mobility

## **Reasons for storage times of personal data**

The storage times are regulated according to the requirements of the legislation, the decisions by the National Archives of Finland and the archiving plan of Turku University of Applied Sciences.

At Turku University of Applied Sciences, the following data is stored permanently

- admissions criteria
- document information related to a request for rectification in terms of admission
- information on the right to study, enrolment, degree, study and degree completion
- information on presence and absence
- information related to a request for rectification in terms of evaluation of study attainments
- issues managed by the Board of examiners

- statements on the thesis, the student's self-evaluations and grade suggestions

In the information systems of Turku University of Applied Sciences, the following data is stored for a fixed period of time

- students' exam attainments and answers, exercises and equivalent data which is accumulated in electronic learning environments
- applications and decisions related to the extension or restoration of the right to study and resignation
- other information on student mobility and student exchange than that related to study attainment information
- student welfare documents (student financial aid, students' accident issues, substance abuse programme and referral to treatment)

In the registers maintained by the Finnish National Agency for Education and national data supplies, the following data is stored permanently

- information on joint application and its additional application and separate applications
- information on the right to study, enrolment, degrees and study attainments to be transferred to the Higher Education Achievement Register VIRTATA

## Central information systems

Students' personal data is processed in several different systems. The joint systems of teaching and study administration at Turku University of Applied Sciences are:

- Management of the enrolments of new degree students: Oili
- Student data register: Peppi
- Individual study plans: Peppi
- Mobile use of student data: Tuudo
- Electronic services of the study administration (applications for degree certificates, extensions and restorations of the right to study, separate rights to study): eForm
- Data of incoming and outgoing exchange students: Mobility Online
- Invoicing information of students at the Open University of Applied Sciences: Peppi (from 2019), eForm, workspace in intranet Messi.

In addition, data is used in the information system environment of TUAS:

- for enabling electronic identification in the information systems of Turku University of Applied Sciences
- for generating user IDs, email addresses and email lists
- for using crisis communications and other communications tools
- for generating user rights to the intranet and informing students
- for enabling identification in information network connections between higher education institutions (so-called HAKA login)
- for user rights to workspaces in the learning environment Optima

- for implementing information system services and for managing their information security and data protection.

Separate rules and instructions on the use and maintenance of information systems are available in Messi. They deal in more detail with e.g. the processing of personal data in maintenance duties.

## **Regular information sources**

Turku University of Applied Sciences receives student data from the following sources:

- From the students themselves
- From the national applicant register Studyinfo, which is maintained by the Finnish National Agency for Education
- From the enrolment register OILI maintained by CSC
- From the Population Register Centre of Finland
- From updates by teachers

## **Regular disclosures and transfers of data**

Disclosure of data takes place with electronic data transfer connections, as single paper printouts, email lists and printed labels.

The data in the register containing student data of the higher education institution are public documents referred to in the Act on the Openness of Government Activities (621/1999), to which access is given upon request according to the requirements of Sections 13 and 16 of the Act.

Data on students, the rights to study, enrolments for academic years, international mobility periods and completed degrees and studies is collected for centralized storage and use in the National Data Supply of higher education institutions (VIRTA). It is not data disclosure as such, but the data remains as a part of the higher education institution's register (Act 484/2013).

In cases prescribed by law, data is disclosed from the student data register to the national Higher Education Achievement Register (VIRTA), from which data is transferred to:

- The admissions register maintained by the Finnish National Agency for Education (Studyinfo) and for the joint admission services of higher education institutions.
- The national service for registering as a student and enrolment for each academic year (OILI).
- In terms of international student mobility, the Finnish National Agency for Education, the European Union or other financier of a mobility programme.
- The Ministry for Education and Culture to support research, evaluation, development, compiling statistics, monitoring and guidance of education.
- Statistics Finland, in terms of datasets for compiling statistics.
- The Social Insurance Institution of Finland (Kela) for the payment of student financial aid and monitoring the progress in studies, and for the evaluation of social benefits.

- Municipalities or other parties which organize student health care for the Social Insurance Institution of Finland (66/1972) according to the Health Care Act (66/1972), to take care of this duty.
- The Social Insurance Institution of Finland, labour authorities and unemployment funds for processing the receiving requirements of labour market support and the daily unemployment benefit.
- The National Supervisory Authority for Welfare and Health (Valvira), to the register of healthcare professionals in Finland (Terhikki) for reinforcement and monitoring of the professional qualifications of healthcare professionals.
- To the immigration and police authorities upon request, for checking the residence permit (notifications of acceptance as a student, notification of acceptance of the study place, study certificate and transcript of records).
- The Finnish Centre for Pensions upon separate requests.
- For scientific research.

Turku University of Applied Sciences has granted the following permissions on the utilization of the data submitted to the National Education Achievement Register (VIRTA)

- OILI (3 Sep 2014): information disclosure permission on the disclosure of information on registration as a student and enrolment for semesters through the national data storage of higher education institutions
- Valvira (20 Nov 2014): disclosure permission of student and degree data through the national data storage of higher education institutions to the National Supervisory Authority for Welfare and Health for the monitoring and reinforcement of the qualifications of healthcare professionals
- EMREX (27 Oct 2015): permission to connect the EMREX National Contact Point plugin in the national data storage of higher education institutions thus that the saved information is accessible to the learners themselves through the EMREX service
- ARVO (13 Apr 2016): permission to connect the Education Management Information Service ARVO to the national data storage of higher education institutions thus that the information from the National Higher Education Achievement Register VIRTA can be accessed and utilized in the ARVO service by the learners themselves
- TUUDO (14 Jun 2016): permission to Caleidon Oy by the learners' consent to retrieve their information from the national data storage of higher education institutions to the TUUDO service thus that the learners can access their information saved by Turku University of Applied Sciences
- UAF (11 Jul 2016): permission to the University Admissions Finland consortium and for combining the consortium's information system to the national data storage of higher education institutions, thus that the student data can be utilized by the higher education institutions in the consortium in the processing of applications



- Follow-up surveys (17 Aug 2016): permission for researchers to utilize the data on completed study attainments saved in the national data storage in research which collects data on studies and their fluency, the employment of graduates and their placement in working life
- JOOPAS/PURO (20 Oct 2016): permission for the JOOPAS consortium to read the data on completed study attainments saved in the national data storage, and upon students' requests, transfer them to another higher education institution to be utilized in the recognition of previous studies
- FIONA (4 Apr 2017): permission through the national data storage of higher education institutions for the remote access of the FIONA research material of Statistics Finland
- The University of Helsinki (25 Jun 2018): permission for disclosure of information and for connecting the information system to the national data storage of higher education institutions, thus that the student data can be utilized in the processing of applications.

Information can be disclosed for scientific research purposes also otherwise than through the VIRTU register. Upon requests for scientific research purposes, the party making the request shall present to the controller the purpose of use of the data and other factors necessary for investigating the requirements for disclosing the information. Upon request, the party making the request shall provide a clarification on how the protection of the data is to be arranged.

In addition, student data is disclosed

- To the library system, for creating user and lending rights.
- For TUO, the Student Union of Turku University of Applied Sciences, in terms of the members' information for the maintenance of the membership register.

The individuals' names, email addresses and other information submitted by the individuals themselves are available for staff and students in systems within the IT environment of TUAS, such as the intranet Messi, in the email address book and in the instant messaging application. In the person index, the data is processed to enable internal communications within the TUAS community, to communicate professional competence and to implement information and reachability services.

## **Non-regular disclosures of information**

Through the student data register, students can give their consent for the use of their name and address information. Students may authorize the disclosure of their contact information for the following purposes:

Direct marketing:

Even if a student has authorized direct marketing, disclosure of the information is never automatic but is considered on a case-by-case basis by the persons responsible for the system. In principle, the data is not disclosed.

Education marketing:

- For purposes which support the studies, for associations and foundations, professional organizations and mostly regional authorities for mailing information, which
  - is intended to promote the studies, professional competence or occupational placement
  - is intended to improve the studying or working conditions
  - is intended to promote students' contacts to their home districts
  - otherwise supports studying, for example for carrying out research, surveys or opinion polls.

Turku University of Applied Sciences complies with a good method of registration and requires that those applying for disclosure of information are appropriately connected to the target group whose information is being requested. Users of name and address data shall report where the data has been received from.

Different group reports (address labels, participants of an implementation, student lists, students of a group, students' progress, implementation diary, implementation evaluations, group's evaluation diary, group's study attainments and the information in the evaluation sheet) printed from the student data register are understood as manual registers. For this reason, when disclosing a report printed from the register, the disclosure is evaluated as disclosing information from a personal data register.

If a student has had a personal data access restriction provided by the civil registry, the information is transferred to the student data register (Peppi) through the study admission service Studyinfo. If a student is granted the right to study from somewhere else (e.g. specialization education, continuing professional education, student mobility etc.) or the student gets a personal data access restriction during the studies, TUAS is not automatically notified of the restriction. In this case the information on a personal data access restriction can be saved in the student data register upon the student's request. The personal data access restriction means an injunction on the disclosure of all the student's contact information.

## **Transferring the information outside the EU or EEA**

Personal data may be transferred outside the EU or EEA:

- in connection with international study admissions and student exchange and to implement these
- when the student participates in international RDI activities (research, development and innovation activities), and
- to implement the IT services necessary for completing the studies.

Only essential data is transferred and the transfer is made according to privacy legislation and within limits set by it. The security and data privacy of the transfer are always agreed on separately.

## **Principles of data protection**

In processing the data in the register, it is taken care of that students' privacy is not jeopardized without cause.

Manual material:

- Stored and protected thus that external parties cannot access them and thus that they cannot be erased, changed, disclosed or transferred by accident or otherwise illegally processed.
- Employees have the right to access only the information of a student that they need in their tasks.
- Documents containing personal data are destroyed by shredding or as confidential waste.

Electronically processed data:

- Network and server equipment are placed in locked premises, with tightly controlled access. The network and servers are appropriately protected.
- User rights are limited by user groups. The visibility of data and right to make updates in the system is defined according to user right roles for different user groups.
- Only those who have user rights to the system can access the information. User rights to the system are defined according to the individual's tasks or student status. The staff is under obligation of confidentiality as defined by the contract of employment.

## Data subjects' rights

You have different rights regarding data privacy. They are described below.

### Access to the information, rectification, right to inspection

You have the right to receive a confirmation on if we process your data at Turku University of Applied Sciences. In addition, those who are studying or have previously studied at Turku University of Applied Sciences have the right to check their information in the student data register. You can request for access to your personal data and rectification regarding incorrect or insufficient information.

If you are a student at TUAS, you can check the data registered on you by logging in the student interface of TUAS' student data register (the Peppi system). You can update your information and other information in the student desktop in Peppi. You also have the right to obtain an official study certificate and transcript of records from the study administration ([opintoasiat@turkuamk.fi](mailto:opintoasiat@turkuamk.fi)).

You can file a request for inspection to the service channel of student affairs ([opintoasiat@turkuamk.fi](mailto:opintoasiat@turkuamk.fi)) or in person at the service point for student affairs (Joukahaisenkatu 3). Based on this, an opportunity to inspect the data is arranged at TUAS' premises. Before granting access to the data, the identity of those who request the inspection is checked based on a passport, driver's license or ID card. If the customer also wishes to have a paper copy of the transcript of records, a fee according to the price list is charged.

In principle, using the right to inspection is free of charge. However, TUAS can charge the data subject a reasonable fee which covers the administrative costs of responding to the request, if the data subject requests several copies of the data. TUAS can charge a reasonable fee for fulfilling the request also in the case if the data subject's request is obviously groundless or unreasonable. The right to inspection is carried out without delay.

### **Erasure of data and restricting the processing**

You can request for erasing your personal data or restricting the processing of your personal data. The right to be forgotten (data erasure) is not valid if we process your personal data in order to comply with statutory obligations or if the processing of your personal data takes place in order to carry out a task regarding public interest or to exercise the public authority of TUAS.

Upon the student's request or on its own initiative, TUAS has to without groundless delay to rectify, erase or complete the personal data in the student data register which is false, unnecessary, incomplete or outdated relative to the processing.

Even upon the data subject's request, data which is necessary for the operations of the higher education institution, faultless or valid is not erased, such as information on accepted study attainments. The higher education institution requires the data on completed studies, even if an individual student would not consider a study attainment necessary or would even consider it harmful. Improving the grade of a course is a reason for replacing an earlier record with a new one. If the student's request of rectifying the data cannot be met, a justified written answer on the rejection is provided to the student.

### **Right to receive a copy of the data and transferring the data**

You have the right to receive the personal data you have provided us with and to transmit that data from one system to another if the processing of personal data is based on your consent or an agreement and the processing takes place by automatic methods.

### **Right to object the processing of the data**

You have the right to object the processing of your personal data if the processing takes place in order to carry out a task regarding public interest or to exercise the public authority of TUAS or if we process your personal data on the basis of our so-called legitimate interest. TUAS will stop the processing, unless we can demonstrate that there is a significantly important and justified reason for the processing and it overrides the data subject's interests and freedom, or the processing is necessary for the establishment, exercise or defence of a legal claim.

### **Automatic decision-making and profiling**

You have the right to not be subjected to a decision which is based solely on automatic processing, such as profiling, if it has legal consequences for you or if it otherwise impacts you considerably. The injunction can however be exempted from, if you have given your particular consent to it or if it is necessary for the making of or implementing an agreement between you and TUAS.

### **Other information**

Our purpose is to describe the processing of personal data as extensively and transparently as possible in this privacy notice.

Please contact the DPO if you have any questions regarding data protection or if you wish to use your related rights. If necessary, you can also contact the controlling authority (Office of the Data Protection Ombudsman) that controls the processing of personal data in Finland.

The contact details of the DPO and other parties can be found in the beginning of the privacy notice. All requests are processed on a case-by-case basis.