EU's General Data Protection Regulation (EU 2016/679), Articles 12–14

Privacy Policy

1. Controller	University of Helsinki; University of Eastern Finland; University of Jyväskylä; University of Lapland; University of Oulu; University of Turku; University of Vaasa, Åbo Akademi; Lappeenranta University of Technology; Hanken School of Economics; University of the Arts Helsinki; Aalto University Founda- tion operating as Aalto University; TTY Foundation operating as Tampere University of Technology (each university is a controller in terms of the per- sonal data in its own sub-register).
	University of Vaasa PL 700, 65101 Vaasa Wolffintie 34, 65200 Vaasa Business ID 0209599-8
2. Contact person for issues related to the register	Specialist Sunna Vainiomaa sunna.vainiomaa@uwasa.fi
3. Data protection offi- cer	Sami Kinnunen sami.kinnunen@uwasa.fi
4. Name of the regis- ter	Register for career monitoring surveys at Finland's universities for graduates with a master's degree or discontinued bachelor's degree and for graduates with a doctor's degree.
5. Purpose of pro- cessing personal data and legal grounds for processing	The purpose of career monitoring surveys is to monitor the early career stages of university graduates and their situation in the labour market (five years for higher university degree graduates or discontinued bachelor's de- gree programme graduates, for example, nursery school teachers and phar- macists, and three years for doctors) and utilise the monitoring information in research, highlighting the early career stages of people with an academic ed- ucation, the development of higher education and student guidance, as well as for offering information for potential students, current students and gradu- ates for planning their own studies and career. In the career monitoring sur- vey, this information is produced and used without identification information about the participants. This information is university-specific, for cooperation between the universities, with cooperation partners and generally for research through the Finnish Social Science Data Archive (FSD).
	Career monitoring surveys are carried out using both a paper form and an electronic form. The electronic response form is made available through the Arvo information service of the Finnish National Agency for Education, maintained and developed by CSC – IT Center for Science. The collection of research data using the paper form and the compilation of data are coordinated by Tampere University's Research Stats Service TUPA. TUPA also incorporates the survey responses from all the participating universities into a nation-wide register.

	Grounds for processing: Duties in accordance with public interest (evaluation and development of university education (sections 2 and 87 of the Universi- ties Act (2009/558)) and production of related statistics). Decree of the Minis- try of Education and Culture on Calculation Criteria for University Core Fund- ing (119/2019)
6. Rekisterin tietosi- sältö	The background information of the career monitoring survey's target group (participants) will be recorded into the register: a) Background information:
	university, year of graduation, year of starting studies, gender, age, national- ity, native language, field of science, study subject, degree level, scope of the degree, year of selection, home municipality, date of graduation, study munic- ipality, duration of being a registered student, duration of actual studies, grade and grade scale of thesis work, possible date of death, moving out of Finland, day of the move, home municipality, study subject and school.
	b) Identification information: name, postal address and postal code, state, student identification code, sur- vey ID, telephone number. Information identifying the respondent (student number, name and contact information) and information about a possible date of death will only be used to send the survey and in order to link the above- mentioned background information.
	c) Survey form ID or electronic form ID and time of response
	d) Survey answers With regard to those who have filled in the career monitoring survey, these sections will be filled in with the information they have given concerning their position in working life, factors related to the quality of employment and the satisfaction of graduates concerning their studies from the perspective of working life.
7. Regular data sour- ces	The background and identification information of the group of respondents will be gathered in a centralised manner from the national VIRTA study infor- mation service and, in supplementary parts, from the student information sys- tems of universities (study subject, faculty). Address data will be supple- mented using the Population Information System, and the telephone number will be acquired from a separate telephone number supplier (Posti/Fonecta/other). Email contact details will be gathered from the universi- ties' student and alumni registries. Response data will be gathered from the answers of the participants. The participants have the opportunity to fill in a paper survey or an electronic online survey. Data from the paper surveys will be recorded in the electronic system as subcontracted by the controllers of sub-registers.
8. Regular data trans- fers and recipient groups	The processing of the register's personal data has been partly outsourced with a subcontract agreement: □ No ⊠ Yes; further information about outsourced processing:

	Based on subcontracting by the controllers of sub-registers, the register is processed by TUPA, statistical research service of the University of Tampere, and CSC - IT Center for Science Ltd.
	CSC - IT Center for Science Ltd selects the target group, enriches the contact information, creates the survey links and collects the online answers, as well as combines the material for reporting. CSC processes direct personal data during data collection and the survey data without the direct data when reporting the results. CSC discloses the personal data (contact information, background information and survey IDs) to TUPA so the survey and reminders can be sent and for analysis of the data.
	TUPA, statistical research service of the University of Tampere, coordinates the implementation of career monitoring and processes personal data in order to send the survey and for analysing and reporting purposes. TUPA discloses university-specific data to each university, to Aarresaari, career service net- work of Finnish Universities and to CSC for national reporting of national sur- vey data. Data can be disclosed to partners (such as professional associa- tions) for research purposes, excluding any personal data from which data subjects can be directly identified.
	In addition, data is also disclosed, without any identifiable personal data, to the Finnish Social Science Data Archive (FSD) for archiving and more de- tailed anonymisation for later research use. The data will be reported publicly so that no single individual can be identified from the results.
9. Transfer of data outside the EU or EEA	 Will registered data be transferred to a third country or an international organ- isation outside the EU or EAA? ☑ No □ Yes, please specify:
10. Retention period for personal data or specification criteria for the retention pe- riod	Identification information enabling the identification of respondents is retained in the register only until data is combined and later destroyed after the data has been processed. TUPA will retain data from different years without any direct identification information for ten years in order to compile time series. The university will retain data from different years without any direct identifica- tion information in its sub-register for ten years in order to compile time se- ries.
	The data will be stored in the Finnish Social Science Data Archive (FSD) anonymously, which means that it cannot be linked to individual people.
11. Information about the existence of auto- mated decision-mak- ing or profiling and in- formation about the logic of processing and its significance for data subjects	The registered data will be used for automated individual decisions, including profiling: ⊠ No □ Yes, please specify:

12. Rights of data subjects	Under the EU's General Data Protection regulation (EU 2016/679), data subjects have the right to view their data, have their data rectified or erased, have the processing of their data restricted, object to the processing of their personal data, as well as the to lodge a complaint with the supervisory authority.
	 <u>Right to view data (right of access to personal data)</u> Data subjects have the right to know whether their personal data has been processed and what personal data concerning them has been recorded.
	 <u>Right to have data rectified</u> Data subject have the right to claim that any erroneous, inaccurate or incomplete personal data be rectified or completed without undue delay. Furthermore, data subjects have the right to demand the erasure of any unnecessary personal data.
	 <u>Right to have data erased</u> <u>In irregular situations</u>, data subjects have the right to have their personal data erased from the controller's register (right to be forgotten).
	 <u>Right to restrict processing</u> In certain situations, data subject have the right to request that the processing of their personal data be restricted until their data has been appropriately inspected and rectified or completed.
	 <u>Right to object</u> Data subjects have the right, on grounds relating to their particular situation, to object to the processing of their personal data at any time.
	 Right to lodge a complaint with the supervisory authority Data subjects have the right to lodge a complaint with the supervisory authority of their permanent place of residence or employment, if they consider that the processing of personal data is in breach of the GDPR (EU 2016/679). In addition, data subjects have the right to use administrative means of change management and other legal protection.
	Contact information: Office of the Data Protection Ombudsman Visiting address: Ratapihantie 9, 6th floor, 00520 Helsinki Postal address: P.O. Box 800, 00521 Helsinki Tel.: +358 29 56 66700 Fax: +358 29 56 66735 Email: <u>tietosuoja@om.fi</u>