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**Privacy Policy**

1. **Controller**
   - University of Helsinki; University of Eastern Finland; University of Jyväskylä; University of Lapland; University of Tampere, University of Turku, University of Vaasa, Åbo Akademi; Lappeenranta University of Technology; Hanken School of Economics; University of the Arts Helsinki; Aalto University Foundation operating as Aalto University; TTY Foundation operating as Tampere University of Technology (each university is a registrar in terms of the personal data in its own subregister).

   Aalto University  
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   FI-00076 AALTO, FINLAND  
   Tel. +358 9 47001  
   Business ID 2228357-4

2. **Contact person for issues related to the register**
   - Manager Riikka Heinonen  
     riikka.heinonen@aalto.fi  
     +358 50 331 6925

3. **Data protection officer**
   - Jari Söderström  
     tietosuojavastaava@aalto.fi, dpo@aalto.fi  
     +358505665186

4. **Name of the register**
   - The register of the career monitoring surveys at the universities of Finland for graduates with a master’s degree or discontinued bachelor’s degree and for graduates with a doctor’s degree.

5. **Purpose of processing personal data and legal basis of processing**
   - The purpose of career follow-up surveys is to monitor the early career stages of university graduates and their situation on the labour market (five years for higher university degree graduates or discontinued bachelor’s degree programme graduates, for example nursery school teachers and pharmacists, and three years for doctors) and utilise the follow-up information in research highlighting the early career stages of people with an academic education, the development of higher education and student guidance as well as for offering information for potential students, students and graduates for planning their own studies and career. In the career follow-up survey, this information is produced and used without identification data of the participants. They are utilised university-specifically, for cooperation between the universities, with cooperation partners and generally for research use through the Finnish Social Science Data Archive (FSD).

   Basis for processing: public interest or exercising of public powers for statistical purposes in order to fulfil the duties defined in the Universities Act (2009/558, Section 2; Section 87).
### 6. Data content of the register

The background information of the career follow-up survey’s target group (participants) will:

- a) be recorded into the register: university, year of graduation, year of starting studies, sex, age, nationality, native language, field of science, study subject, degree level, scope of the degree, year of selection, home municipality, date of graduation, study municipality, 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 faculty.

- b) Identification information:
  - name, postal address and postal code, state, student identification code, survey id, phone number.

- c) Survey answers

  With regard to those who have filled in the career follow-up 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.

  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.

### 7. Regular data sources

The background and identification data of the group of respondents will be gathered in a centralised manner from the national VIRTA study information service and, in supplementary parts, from the student information systems of universities (study subject, faculty). Address data will be supplemented using the Population Information System and phone number will be acquired from a separate telephone number supplier (Post/Fonecta/other). 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 sub-contracted by the controllers of sub-registers.

### 8. Regular data transfers and recipient groups

The processing of the register's personal data has been partly outsourced with a sub-contract agreement:

- ☐ No
- ☒ Yes, information on the outsourced processing:

Based on a sub-contract 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 picks the target group, enriches the contact information, creates the survey links and collects the online answers as well.
as combining the material for reporting. CSC processes direct personal data during the data collection and the survey materials 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 materials.

TUPA, statistical research service of the University of Tampere, coordinates the implementation of the career follow-up and processes personal data in order to send the survey and for analysing and reporting purposes. TUPA discloses the university-specific materials to each university; to Arresaari, career service network of Finnish Universities, and to CSC for national reporting of the national survey materials. The materials, without any identifiable personal data, are also disclosed to the Finnish Social Science Data Archive (FSD) for more detailed anonymisation and in order to be archived for later research use. The results will always be reported so that feedback given by an individual participant cannot be identified.

<table>
<thead>
<tr>
<th>9. Transfer of data outside the EU or EEA</th>
<th>Will the register data be transferred to a third-party country or an international organisation outside the EU or EAA:</th>
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<tbody>
<tr>
<td></td>
<td>☒ No</td>
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<td>☐ Yes, where:</td>
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| 10. Register protection principles   | A manual materials                                                                                                    |
|                                      | -                                                                                                                     |
|                                      | B electronically processed materials                                                                                 |
|                                      | -                                                                                                                     |

| 11. The storage period for personal data or defining criteria for the storage period | Identification data enabling identification of respondents are stored in the register only until the materials are combined and data is destroyed after the materials have been processed. TUPA will store the materials of different years without direct identification data for 10 years in order to compile time series. The data will be stored in the Finnish Social Science Data Archive (FSD) anonymously which means that it cannot be linked to individual people. |

| 12. Information on the existence of automatic decision-making or profiling and information of the logics of processing and its significance to the data subject | The register data will be used for automated individual decisions, including profiling: |
|------------------------------------------------------------------------------------------------| ☒ No                                                                                   |
|------------------------------------------------------------------------------------------------| ☐ Yes, where:                                                                          |

| 13. Rights of the data subject | Data are used for statistical purposes. Under the EU's General Data Protection regulation (EU 2016/679), the data subject has the right to inspection, rectification, restriction of processing and prohibiting of processing of their personal data as well as the right to lodge a complaint with the supervisory authority. |
- **Right to inspection of data (right of access to the personal data)**
  - The data subject has the right to know whether their personal data has been processed and what personal data concerning them have been recorded.

- **Right to data rectification**
  - The data subject has the right to claim that their erroneous, inaccurate or incomplete personal data are rectified or completed without undue delay. Furthermore, the person has the right to demand the erasure of unnecessary personal data.

- **Right to restrict processing**
  - In certain situations, the data subject has the right to request the restriction of processing their personal data until their data has been appropriately inspected and rectified or completed.

- **Right to object**
  - The data subject has the right, on grounds relating to his or her particular situation, to object to the processing of their personal data.

When the national data protection act comes into force, these rights will be restricted in order to enable the collection of statistical materials (Government proposal 9/2018).