

Privacy Notice

This privacy notice explains how Aalto University processes your personal data after you have responded to the AllWell? student survey.

1. Why and on what basis does Aalto University process your personal data?

The purpose of the Aalto University's AllWell? student survey is to gather information from Aalto University students on studying at Aalto University and on their self-concept as students. Background information about the target group of the survey will be obtained from the student information register for the purpose of sending the survey and grouping, analysing and reporting the responses and results. All students who have completed the survey receive personal feedback on the survey. Any background information will not be used in formulating the feedback. The parties responsible at the Aalto University's school, degree programme and academic major level will receive survey information about their students' experiences.

The university's right to process personal data as a controller is based

- on the necessity to perform a task carried out in the public interest or in the exercise of official authority (Article 6(1) point e)
- on the necessity to comply with a legal obligation (General Data Protection Regulation, Article 6(1) point c)
- on the consent given by the data subject and, in certain cases, when necessary for the performance of a contract (Article 6(1) points a and b).

The university has a right as controller to process special categories of personal data when

- the processing is necessary for reasons of substantial public interest (Article 9(2), point g).
- the processing is based on the provisions of an act or for a task or obligation to which the controller is bound by or on the basis of an act (section 6, subsection 1 of the Finnish Data Protection Act 1050/2018),

Main statutes

- Universities Act (558/2009) and the decrees given under it
- the Government Decree on University Degrees (794/2004) as amended and any prior decrees concerning degrees in science and technology, business, and art and design
- the act on national study and degree registers (laki valtakunnallisista opinto- ja tutkintorekistereistä, 884/2017, chapter 5)
- the General Data Protection Regulation (EU) 2016/679 and its complementary national statutes
- the Act on the Openness of Government Activities (621/1999)

2. What personal data does Aalto University process?

Aalto University processes the following categories of personal data concerning students when using the AllWell? survey material to give personal feedback to students and when producing various reports and statistics.

Data collected from the Aalto University's student information register

Personal identifiers used for sending the survey invitations:

name, aalto.fi email address, phone number (Webropol survey identifiers)

Background information:

Identification data: student name, student number

Other information: gender, school, department, degree programme and major, preferred language and mother tongue, nationality, tuition fee liability. Total credits earned, credits earned in current academic year and average grade of completed courses. Current student status, number of terms enrolled as an attending and non-attending student, start date of studies and degree pursued.

Information collected from students in the questionnaire form:

Previously completed bachelor's degree

Students' numerical responses and open text-field responses in the following subject areas:

Study skills: prior knowledge, motivation, self-efficacy, test anxiety, self-criticism, organised studying, study technique, problems with learning. Personal resources: life situation and conditions, identity, career certainty, certainty over the direction of your life, concentration, executive function, social relationships, wellbeing. Teaching and supervision; assessment and feedback, student commitment and involvement, interest in teaching, constructive alignment of teaching and degree programme, programme workload, student-oriented guidance. Study environment: the digital, physical, and cultural study environment, safe atmosphere, peer support. Study wellbeing and workload: study burnout, experience of study wellbeing. Use of time: use of time for studying and paid work.

Information that may contain special categories of personal data (sensitive data):

- Risk of study burnout: stress and reduced study motivation; emotions: self-criticism, questions concerning personal resources, and the optional open text-field responses given by the student.

Survey participants' responses are linked to their background information.

3. Disclosure of personal data for research purposes

Student responses to the AllWell? survey and data in the student information register combined with it, as well as other teaching and learning feedback given by Aalto University students and information related to course completions may be disclosed for research purposes in compliance with the General Data Protection Regulation (EU 2016/679) and the Finnish data protection legislation. In the survey, the student is asked to give their consent for their data being disclosed for scientific research purposes. A condition for disclosing personal data for scientific research is that no individuals will be identifiable from the research publications.

4. Processor of personal data

The survey is conducted in the Webropol system, for additional information, see [Privacy policy | Webropol](#).
Aalto University has an agreement on the processing of personal data in the Webropol system.

5. Transferring your data to third countries

Not transferred.

6. How does Aalto University protect personal data?

Information security is important to Aalto University. Aalto University utilizes appropriate technical, organizational and administrative safety precautions to protect personal data against disappearance, misuse, unlawful use, transferral, change or destruction.

At Aalto University, only the persons responsible for the contents and technical implementation of the survey are allowed to process the students' survey responses that contain information enabling individual students to be identified. These persons are not associated with the Aalto University schools or degree programmes. Student responses to the AllWell? survey are combined with data in the student information register and may also be combined with other teaching and learning feedback given by Aalto University students as well as with information related to course completions.

Aalto University, its schools, degree programmes and majors are provided with various results reports and summaries on students' numerical responses so that individual student responses cannot be identified from the reports and summaries. The reports and summaries may also be presented and distributed to Aalto University's stakeholders, such as the Aalto University Student Union (AYY) and student organizations.

Only the persons responsible for the contents and technical implementation of the survey are allowed to process feedback that is given by students in open text fields when it is connected with direct identifiers, such as a student's name. Open text-field responses are primarily provided in unprocessed form to Aalto University's schools, degree programmes, majors and education and service development staff, but they are not connected to direct identifiers, such as the names of students who gave the responses. Aalto University may at its discretion remove sensitive information or other personal data from the responses before providing them to any of the parties mentioned above. The responses are processed in the language they have been originally written. It is possible that a student may be identifiable from their response in an open text field. Open text-field responses may only be presented and distributed to Aalto University's stakeholders in a summarised form from which no individual respondents can be identified.

7. How long is your personal data retained?

Direct identifiers, such as personal data containing names, will be stored for four (4) years for the purpose of analysing and comparing the survey's results. Personal data from which direct identifiers have been removed will be stored for ten (10) years at most.

8. Updates to this privacy policy

This privacy notice may be updated as regards Aalto University education and research. The latest version is available on this page: <https://www.aalto.fi/en/services/the-allwell-student-survey>

9. Your rights

You have rights related to the processing of your personal data by Aalto University. The extent of your rights is tied to the legal basis for processing your data and applicable legislation.

A) The right to access data

You have the right to access personal data related to you that is being processed by Aalto University.

B) The right to rectification

You have the right to rectify erroneous or incomplete data.

C) The right to be forgotten

You have the right to request the removal of your personal data in the following situations:

- You revoke your consent to process your personal data and there is no other legal basis for processing
- You resist the use of your personal data in direct marketing

Aalto University will, in many cases, be required to retain your personal data to comply with legal and other obligations.

D) The right to restrict processing

If you dispute the correctness of the data we have collected or the legality of our processing, or if you have restricted the processing of the data in accordance with your rights, you may ask us to restrict the processing of your personal data to storage only. In these cases, the processing of your personal data will be restricted to storage until the correctness of the data can be verified or we have ascertained whether our legitimate interests supercede your right to restrict our processing activity. If you do not have the right to request the removal of your personal data from our registers, you may instead request the restriction of data processing to storage only.

E) The right to object to data processing when processing is based on legitimate interests

You always have the right to object to the use of your data in direct marketing.

F) The right to data portability

You have the right to receive your personal data in a machine-readable format. This right concerns personal data that has been processed only in an automated manner based on consent or contractual bases.

If you wish to use the rights listed above, your request to do so will be judged on an individual basis. Please note that we may retain and process your personal data if it is required to fulfill our legal obligations, to solve disputes or to fulfill contractual obligations.

10. How do you use your rights?

The controller is Aalto University. In the above description we aim to give a clear view on our data processing activities. If you have questions regarding the processing of your personal data, we have not succeeded in our aim. In these cases, please contact us:

Requests under the GDPR concerning the processing of personal data can be submitted through our personal data portal: Aalto university personal data portal
(<https://datarequest.aalto.fi/en-US/>)

Please note, that regular service addresses allwell@aalto.fi for different services will still be used primarily for contact information changes and other routine changes.

The data subject may also contact the data protection officer of Aalto University if they have questions or demands relating to the processing of personal data:

DPO: Sirpa Syrjälä
Phone: 09 47001

Email: [dpo\(at\)aalto.fi](mailto:dpo(at)aalto.fi)

If you believe your data has been processed in breach of applicable data protection legislation, you have the right to lodge a complaint with the supervisory authority, the Data Protection Ombudsman (read more: <https://tietosuoja.fi/en/home>).

Other privacy notices

Privacy notice for students: <https://www.aalto.fi/en/student-guide/privacy-notice>