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EU General Data Protection Regulation (EU

Privacy Notice

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-Lahti University of Technology (LUT); Hanken School of Economics; University of the Arts Helsinki; Aalto University Foundation operating as Aalto University; Tampere University Foundation operating as Tampere University (each university is a controller of the personal data in its own sub-register).
	Aalto University P.O. Box 11000 FI-00076 AALTO, FINLAND Business ID 2228357-4
2. Contact person for issues related to the register	Specialist Susanna Saarinen susanna.saarinen@aalto.fi
3. Data protection officer	tietosuojavastaava@aalto.fi, dpo@aalto.fi,
4. Name of the register	Register for career monitoring surveys aimed at those who have completed a master's degree, a 'terminal bachelor's degree' (without a right to continue to a master's degree) or a doctoral degree at a Finnish university.
5. Purpose and legal basis for processing personal data	Evaluation, development and statistics relating to university education The purpose of career monitoring surveys is to track the early career stages of university graduates and their situation in the labour market (after five years for master's degree graduates or 'terminal bachelor's degree' graduates, for example, pharmacists and teachers in early education and care, and after three years for doctors). Additionally, the results will be used to research the early career stages of academically educated people, improve higher education and student guidance, and provide prospective and current students and graduates with information to plan their studies and careers. In the career monitoring survey, this information is produced and used without any identifying details within and between the universities and their cooperation partners, e.g. trade unions, such as AKAVA or Suomen Ekonomit (The Business School Graduates in Finland). The survey questionnaire includes the respondent's e-mail address if the respondent wishes to be entered into a prize draw organised among the respondents who have provided their contact details. The e-mail addresses collected on the questionnaire for the purpose of the draw will be stored until the prize has been drawn. The e-mail addresses will not be connected to individual responses or used for anything other than communication related to the prize draw.

	Legal basis for processing: tasks carried out in the public interest (evaluation and development of university education (sections 2 and 87 of the Universities Act (2009/558)) and production of related statistics). Decree of the Ministry of Education and Culture on calculation criteria for university core funding (119/2019) Scientific research In addition to the aforementioned purpose, the data may be used for scientific research. Data may be disclosed for scientific research purposes in accordance with the conditions laid down by law. For the purposes of scientific research, a respondent's unique identifier may be used to link the data to data in other registers (e.g. in the FIONA service of Statistics Finland) in such a way that the researcher does not gain access to the unique identifier. Legal basis for processing data: The legal basis for processing personal data is scientific research in the public interest.
6. Data content of the register	The details recorded of the target group of the career monitoring survey (respondents) are specified below. a) Background information: Information related to the relevant right to study and the degree completed, such as the level of the degree, subject, year of admission and graduation, tuition-fee liability, the grade of the thesis, and information related to the respondent, such as gender, age, nationality and mother tongue. b) Identifying details: name, postal address and postal code, country, student identification code, survey ID, telephone number. c) Survey answers: For 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. 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 to link the above-mentioned background information. Aalto University's own artificial intelligence tool (Aalto AI Assistant) can be used to analyse the responses, provided that the data is used in a pseudonymised and aggregate form.
7. Regular data sources	The background information and identifying information of the group of respondents will be gathered in a centralised manner from the national VIRTAs study information service and supplemented by data from the student information systems of universities (subject, faculty). Address data will be supplemented 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 universities' student and alumni registries. Response data will be gathered from the

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	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 transfers and recipient groups	The processing of the register's personal data has been partly outsourced under a subcontracting agreement: ☐ No ☒ Yes; further information about outsourced processing: Based on a subcontracting agreement by the controllers of sub-registers, the register data is processed by the Research Stats Service TUPA 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 that the survey and reminders can be sent and the data analysed. The Research Stats Service TUPA of the University of Tampere coordinates the implementation of career monitoring and processes personal data in order to send the survey as well as to analyse and report the results. TUPA will provide each university with its own data and will also provide the network of university career and employment services, Aarresaari, and CSC with national-level data for the purposes of national reporting on the survey. Data can be disclosed to partners (such as trade unions) for research purposes, excluding any personal data from which data subjects can be directly identified. Data may also be disclosed to partners (e.g. trade unions such as AKAVA) for research purposes, provided that no personally identifiable information is included.
9. Transfer of data outside the EU or EEA	Will registered data be transferred to a third country or an international organisation outside the EU or EEA? ☒ No ☐ Yes, please specify:
10. Principles of protecting the register	A manual data The Research Stats Service TUPA stores the paper response forms in a locked cupboard on the Tampere University premises.
	B electronically processed data Your personal data is processed and stored in secure systems approved by the university. The computers and information systems used are protected with a username and strong password. Access to research data containing personal data has been restricted so that only those individuals whose access is essential for the analysis of the survey data and the conduct of the research have access to your personal data.

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11. Retention period for personal data or specification criteria for the retention period	Information enabling the identification of respondents is retained in the register only until data is combined and destroyed after the data has been processed. TUPA will retain data from different years without any direct identification information for 10 years in order to compile time series. The university will retain data containing identifying details in its sub-register for a maximum of 5 years.
12. Information about the existence of automated decision-making or profiling and information 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:
13. 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> - o 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> - o Data subjects 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> - o In exceptional cases, 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> - o In certain situations, data subjects have the right to request that the processing of their personal data be restricted until their data has been appropriately checked and rectified or completed. - <u>Right to object</u> - o Data subjects have the right, on grounds relating to their particular situation, to object to the processing of their personal data at any time. Requests to exercise the rights of data subjects must be sent to the university to tietosuojavastaava@aalto.fi, dpo@aalto.fi.

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	Through this information request service, you can request that Aalto University as a data controller enable you to exercise your rights in accordance with the General Data Protection Regulation: https://datarequest.aalto.fi/fi-FI/. - <u>Right to lodge a complaint with the supervisory authority</u> - o 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 requesting for a review and other legal remedies. Contact information: Office of the Data Protection Ombudsman Visiting address: Lintulahdenkuja 4, 00530 Helsinki Postal address: P.O. Box 800, FI-00531 Helsinki Telephone exchange: Tel.: +358 29 56 66700 Email: tietosuoja@om.fi
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