Aalto University
13 October 2026
Public

Privacy Notice

This privacy notice explains how Aalto University processes your personal data for participating in the International Student Barometer (hereafter ISB) survey.

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

The ISB survey is commissioned every 4-5 years by Aalto University from Etio, which is part of the International Graduate Insight Group Ltd (UK).

The purpose of the ISB survey is to gather information from Aalto University international students across a broad spectrum of experiences in order to improve their stay at Aalto and in Finland.

The survey requires a minimum level of background information (nationality and current enrolment status, email address) to reach the right target group. These details are obtained from Aalto's student information register and are not provided to the company collecting the survey data.

The staff members responsible for development actions at Aalto's schools, degree programmes and services receive the survey results and reports in statistical and pseudonymised format, curated by small, university-level ISB team at Aalto for analysis and review of Aalto development needs.

Some reports and summaries are presented to Aalto's stakeholders, such as Aalto University Student Union (AYY) and City of Espoo, for improvements in the areas that affect international students but are not governed by Aalto, such as student housing, employment services, banking services and transport.

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 as part of the ISB?

Aalto University processes the following categories of personal data of students when forwarding the ISB survey link to students:

Data collected from the Aalto University's student information register

Personal identifiers used for sending the survey links:

Aalto.fi email address

Background information:

Nationality, enrolment status, start date of studies, name, email are needed to send the survey to the right target group. This data is not connected to the survey answers and is used only to select the students who receive the survey link, information and reminders.

Information collected from students in the questionnaire form:

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

Demographics, school, previous education, general overview of satisfaction, general willingness to recommend Aalto, application experience, selection of university, arrival experience, learning experience, artificial intelligence engagement, student engagement, support services, campus facilities, social experience, career support, wellbeing, inclusivity, future plans, immigration service experience, agent satisfaction.

Optional open text-field responses given by the student may contain special categories of personal data (sensitive data) if student chooses to disclose it against Aalto's instructions (not to disclose any data that can be used to identify individuals).

The survey does not request the disclosure of any sensitive data.

Aalto approved AI tools may be used in the analysis of the responses.

3. Disclosure of personal data for research purposes

Student responses to the ISB survey are not disclosed for research purposes by Aalto University.

4. Processor of personal data

The survey is conducted by the Etio's Unique Links Process that Aalto has approved and that minimises the processing of personal data:

Unique links process

- The process for Unique links involves Etio's Technical Team generating x number of links and sending them over to Aalto.
- Etio does not have the email addresses or any student personal data for this.
- Aalto creates and retains a list of who the unique links are for and sends out the links to the students.
- Etio informs Aalto which links haven't been answered so that Aalto can send/not send reminders to relevant students.

Etio processes the survey data without direct identifiers according to their own privacy policy: https://etioglobal.org/privacy-policy.

5. Transferring personal data to third countries

Aalto does not transfer any personal data outside of Aalto as part of the ISB survey.

6. How does Aalto University protect personal data?

Students complete the ISB survey via unique link provided by Etio, forwarded to students by Aalto. Data is collected on strictly anonymised basis: Aalto does not see the answers to any link, Etio does not know who opens the link.

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

At Aalto, only the persons responsible for the contents and technical implementation of the ISB survey are allowed to process the raw survey data that is provided to Aalto in statistical and pseudonymized form. These persons are not associated with the Aalto University schools or degree programmes.

Despite the instructions for respondents not to give any information in the survey that would enable identification of any individuals, the raw open answers of ISB survey may contain some

information (e.g. course codes, professional titles or positions) enabling individuals to be identified. To prevent such possibility, the raw answers are carefully curated by a small team of 1-5 Aalto staff members with exclusive access rights to ensure that any answers where individuals can be identified, are either redacted sufficiently to remove the identifiers or, if this is not possible, removed from the survey results altogether.

Result reports and summaries for Aalto staff, as well as for the stakeholders, are always presented in such way that individual students, staff members or responses cannot be identified or linked to the answers.

Aalto does not combine any of the survey results with any other data from any of its registers. Efforts to identify any individuals from the survey with or without any other data in Aalto's registers are strictly prohibited.

7. How long is your personal data retained?

Aalto retains the direct identifiers that are essential for conducting the survey for the contractual period of 18 months.

The survey results will be stored for ten (10) years for the purpose of analysing and comparing the results with previous/other surveys.

8. Updates to this privacy policy

This privacy notice may be updated for the forthcoming rounds of the ISB survey at Aalto. The latest version is available on this page: https://www.aalto.fi/en/services/international-student-barometer-isb

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/)
Regular service addresses 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:

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DPO: Sirpa Syrjälä
Phone: 09 47001
Email: 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