Privacy notice for Aalto University's events, communications and marketing

Privacy Notice to Data Subjects

This privacy notice contains information required in the Articles 13 and 14 of the EU General Data Protection Regulation.

<table>
<thead>
<tr>
<th>Personal data</th>
<th>Aalto University's events, communications and marketing</th>
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</thead>
<tbody>
<tr>
<td>Date:</td>
<td>13.06.2018: Updated 3.10.2018</td>
</tr>
</tbody>
</table>

| The controller | Aalto University  
Mailing address: PL 11000, 00076 Aalto  
Visiting address: Otakaari 24, 02150 Espoo  
Phone: (09) 47001 |
|----------------|----------------------------------------------------------|

| Person responsible for the register and the contact person | Each event and newsletter has a designated person in charge and a contact person. Contact information is provided in conjunction with an event announcement, invitation or newsletter. |

| The data protection officer and contact information | The data protection officer of Aalto University is Jari Söderström.  
Mailing address: PL 11000, 00076 Aalto  
Visiting address: Otakaari 24, 02150 Espoo  
Phone: (09) 47001  
Email: tietosuojavastaava@aalto.fi |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|

| The purpose of the register and the legal basis for processing | The purpose of the processing of the personal data is to:  
- support the communication of the university and its departments for addressing the task of social interaction, as well as distribution of newsletters,  
- support the university and its departments in marketing of the activities, events and the provided education,  
- support the realization of events organized by the University, its units and personnel representing Aalto University, and  
- to collect and administrate the necessary personal data of event participants.  
The information is used for:  
- the administration of participation information on events, invitations, meetings and other occasions, |
- the practical realization of a particular event,
- communications regarding future events,
- the sending of publications and newsletters,
- Marketing in accordance with article 200 paragraph 2 of the Act on electronic services (917/2014), and
- management of personal data required for security arrangements.

The legal basis for the processing of the personal data is the processor’s legitimate interest in relation to the data subject, formed on the basis of event registration or joining a mailing list for a newsletter or other communication. The legal basis for the processing of personal data of media and other stakeholder representatives is the legitimate interest of the controller in relation to the implementation of the university’s operations. The legal basis for handling personal data required for security arrangements is the legitimate interest of the controller based on the employment relationship and, for subcontractors, the implementation of the service contract.

The processing of personal data is based on separate consent when:
- data is processed for commercial direct marketing as defined in article 200 paragraph 1 of the law on services related to electronic communication (917/2014) and
- information is transferred to partners who are connected to the event content.

This privacy statement does not apply to private events arranged by Aalto personnel.

| Data is gathered directly from the data subject | Yes |
| Data is gathered from another source than directly from the data subject | Yes:  
- data may be gathered from the organization or the person who registered you to the event  
- the event may be recorded (for example with photographs, videos and recordings) or streamed directly |
| Description of the categories of personal data processed | In conjunction with most events the following basic personal data is gathered:  
- Name  
- Required contact information  
- Organization  
- Title  
- Name and contact information of registrar, if different from participant |
Depending on the event we may also need to gather
- Participant’s role at the event
- In the case of international events, the participants’ home country for statistical purposes
- Information related to the participation fee and its payment
- Dietary information, if the event includes food service
- Information related to the organization of supplementary programs and services
- Information related to publication
- Information related to the organization of travel services
- Participation to parts of the event program
- Information created by recording the event (for example photographs, videos and recordings)
- Your subjects of interest regarding training
- Your feedback on training (gathered anonymously).

In addition, information regarding a single participant’s participation history may be gathered.

For the purpose of communications and marketing, the following information on the media and other key stakeholders can be collected:
- Name
- Required contact information
- Organization

For the purpose of security arrangements, the following information can be gathered from the employees of the Aalto University, its subcontractors and the participant organization:
- Name
- Date of birth
- Employer
- The role at the event.

### The receivers of the personal data and the categories of receivers (= transfers)

Registration to events is mainly conducted through services available online, such as Webropol, Google Forms, Microsoft O365 and eAge. The platform for registration may also be some other system that Aalto University considers appropriately safeguarded.

The participant’s basic information and participation history may be saved in the university’s common customer relationship management database.

Information regarding participation in employee training is also saved in Aalto University’s HR databases based on information gathered from the participation sheet of the event.

Information gained from recording the event may be saved to Aalto University’s material repository or the service of a reliable university partner.

Only Aalto University staff has access to your participation information, and it
may be transferred to a reliable university partner that is participating in the organization of the event.

Dietary information may be transferred to a service provider responsible for providing catering services at the event. Otherwise this information is not transferred to third parties in an identifiable format.

Information related to special needs that has been gathered personally is only used for the specific purpose in question, and is processed with a special degree of care.

We may provide participants with a list of event participants that includes the name and organization of each participant. This participant list is not published on a public platform, such as on the internet.

In the sending of newsletters, bulletins and marketing messages Aalto University may utilize a service provider or the services of a reliable partner.

Personal data may be disclosed to the participating organization in the extent required by the security arrangements when the organization has the legal right to process such personal data.

<table>
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<tr>
<th>Transferring data to other countries</th>
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<tbody>
<tr>
<td>We may transfer recordings of the event to the participants and for the purposes of the university’s teaching, marketing, research and event communications.</td>
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<tr>
<td>These recordings and live streaming of the event may be passed to non-EU/ETA countries. The university’s policy is to take special care if personal data is transferred to countries that are outside of the EU/ETA and do not offer data protection to the standards set by the GDPR.</td>
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<th>Data retention period / definition criteria</th>
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<td>Personal data is retained as long as necessary for the provision of the service. Personal data is retained for the period set forth by the university’s information control plan.</td>
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<tr>
<td>Participant lists and other information related to a single event will be retained for a maximum of one (1) year after the conclusion of the event. Aalto University partners are required to destroy any information transferred to them after the conclusion of the event.</td>
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<tr>
<td>Information related to the billing and other bookkeeping of the event is retained for at least six (6) years after the end of the calendar year during which the event took place or according to the university’s information control plan.</td>
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<tr>
<td>Information on a newsletter’s or other communication’s recipient list is retained until the recipient discontinues their order of said distribution or their address is no longer valid and they do not provide a new address.</td>
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You may prohibit the use of your information for marketing as defined in
article 200 paragraph 2 of the law on services related to electronic communication (917/2014).

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<th>Rights of the data subject</th>
<th>The right to access data</th>
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<td></td>
<td>You have the right to know what data related to you is being processed by the university and what data related to you is being retained. The university will, at your request, provide you with your information without undue delay. The time limit for providing you with the information you have requested or with further information on your access request is one month from the receipt of the request.</td>
</tr>
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The right to rectification
You have the right to demand that incorrect, incomplete or inaccurate personal data regarding your person be rectified or supplemented without undue delay. In addition, you have the right to demand that unneeded personal information regarding your person be removed.

The right to be forgotten
Depending on the legal basis for processing your personal data, you may have the right to request the removal of your personal data from the university’s registry. This right is not given in situations such as those where your data is being processed to fulfill a legal obligation or for exercising public authority. In the processing and removal of your information, the university’s information control plan and the demands set by legislation will be followed.

The right to transfer data
You have the right to receive your personal data in a generally used, organized and machine-readable format and the right to transfer this data to another controller without being impeded by Aalto University. This right concerns personal data that has been processed only in an automated manner based on consent or contractual bases.

You can use your rights by contacting the data protection officer of Aalto University (tietosuojavaltuutettu@aalto.fi).

The right to lodge a complaint with a supervisory authority
You have the right to lodge a complaint with the supervisory authority if you feel that your data is being processed in a way that breaches the general data protection regulation. In addition to this, you have the right to use other administrative appeal procedures and legal protective measures.

You also have the right to take legal action against the controller or an organization acting as a data processor if you feel that the general data protection regulation has not been followed in the processing of your personal data.