

<b>Publicity:</b>	<b>Public</b>
<b>Document number:</b>	<b>GDPR-DOC-xxx</b>
<b>Version:</b>	<b>1/2018</b>
<b>Date:</b>	<b>22 August 2019</b>
<b>Document author:</b>	<b>Jari Söderström</b>
<b>Document owner:</b>	<b>Communications Services, Jaakko Salavuo</b>

## **Privacy notice for Aalto University communication and events (all Aalto units)**

### **Introduction**

- 1. Why and on what basis does Aalto University process your personal data?**
- 2. What personal data does Aalto University collect and process?**
- 3. How do we collect personal data?**
- 4. To whom do we disclose personal data?**
- 5. Transfer of personal data to third countries**
- 6. Period for which personal data is retained**
- 7. Rights of the data subject concerning personal data**
- 8. Right to receive notice of a security breach of your personal data**
- 9. Controller, person-responsible and contact details**
- 10. Exercise of rights**
- 11. Your responsibility**
- 12. Personal data and principles of privacy protection**
- 13. Amendments to the privacy notice**

### **1. Introduction**

Protecting your privacy and processing your personal data responsibly is a high priority for us at Aalto University.

This privacy notice describes the Aalto University policy on collecting and processing personal data at university and unit levels in the contexts of communication, marketing, events and receptions, newsletter distribution, as well as handling feedback and carrying out surveys at both the university and unit level. The privacy notice also covers the events organised by members of the Aalto University staff acting in their capacity as representatives of the university. The privacy notice does not cover private events.

Aalto University operates in compliance with the Act on the Openness of Government Activities (621/1999). Pursuant to the openness principle set out in the act, information in the possession of a university is public unless otherwise provided by law. Furthermore, compliance with the act may obligate the university to disclose personal data to third parties.

### **2. Why and on what basis does Aalto University process your personal data?**

Aalto University and its units use personal data for:

- communication and distribution of newsletters,
- organising events and disseminating information about them,
- providing and developing of digital and other communication services,

- handling feedback, and
- carrying out surveys

Aalto University processes personal data for the purposes of events, marketing, and printed and digital communication, including communication in social media as well as handling feedback and carrying out surveys. The purpose of the processing of personal data is to allow the Aalto community members to interact with both each other and with society at large. In addition, the university may process personal data in order to protect it, as well as to prevent and investigate its abuse as necessary.

The legal basis for processing the personal data is the legitimate interest of the university in carrying out its mission of societal interaction or arising when a data subject registers for an event or subscribes to a newsletter or other communication channel. The processing of personal data is based on consent when the data is used for targeted electronic direct marketing.

### **3. What personal data does Aalto University collect and process**

The personal data processed by the university may be divided into the following categories:

- **Data given by the data subject when registering for an event**, such as contact information
- **Data given by the data subject upon contacting Aalto University**
- **Personal data contained in photographs and videos**, such as an identifiable person in a photograph taken at an event.
- **Personal data contained in marketing and communication material**
- **Personal data collected for the purposes of security arrangements**

The personal data processed contains at least the following information:

- name
- required contact details
- organisation
- job title
- name and contact details of information source if different from participant

The personal data processed may also contain the following data:

- role of the participant in the event
- for international events, the home country of the participant for statistical purposes
- amount of participation fee and payment details
- dietary restrictions, if food is served at the event, and information on special arrangements (no information on illnesses are collected)
- data related to organising side events and additional services
- data related to publishing
- data related to organising travel services
- data generated when the event is recorded (e.g. photos, videos, audio recordings)
- areas of interest specified by a training participant
- feedback on the training (collected anonymously)

In addition, we may collect data on the event participation history of an individual data subject.

#### **4. How do we collect personal data?**

As a rule, we collect data directly from the data subjects in connection with their registration for an event or another contact made by them.

Personal data may be collected and updated using other personal data files of Aalto when a legal basis for it exists, as well as from the following: the Finnish Trade Register; online services and software applications of companies; authorities and companies providing services concerning personal data; and any publically accessible online sources.

For the purposes of security arrangements, the university may collect personal data from its own personal data files and those of its service providers and contract partners, when a legal basis for data collection exists.

#### **5. To whom do we disclose personal data?**

##### **A) Service providers and distribution of photographs and videos in social media**

Aalto collaborates with selected partners in personal data processing for purposes specified in this privacy notice, such as maintaining websites and organizing events. One example of such collaboration is the possibility of Aalto event participants taking photographs and sending them using Microsoft Teams.

We disclose personal data to our partners only to the extent necessary for them to offer services to Aalto for the purposes defined in this privacy notice.

In addition, Aalto University may share photographs and videos in social media services. The processing of personal data contained in these photographs is subject to the privacy notices of the services used. See, for instance, the following social media services:

- Facebook (<https://www.facebook.com/>)
- Instagram (<https://www.instagram.com/>)
- YouTube (<https://policies.google.com/privacy>)

Information on dietary restrictions or personal special arrangements may be disclosed to a relevant service provider, and be disclosed primarily in a format that does not allow the information to be connected to an identifiable person.

##### **B) To teachers and researchers**

We may in some instances disclose personal data for scientific research or teaching. In such cases the data is processed in accordance with the requirements of the EU's General Data Protection Regulation and of Finland's legislation on data protection.

##### **C) To third parties when required under law**

We may disclose your personal data to third parties where access to or processing personal data is necessary:

- to comply with applicable legislation and/or court order, or
- to detect, prevent or otherwise address technical or security issues or malpractice.

## **D) Other recipients**

Basic information and participation history of the data subject may be saved in the university's common customer relationship management database.

We may disclose to event participants a list of the names and organisations of everyone participating in the event. We will not publish the participant list on a public platform, such as the internet.

### **6. Transfer of personal data to third countries**

The data protection policy of the university is to exercise particular care when transferring personal data outside the EU and the EEA to countries that do not offer the data protection required by the European General Data Protection Regulation (GDPR). Transfers of personal data outside the EU and EEA are done in accordance with the requirements of the GDPR, using as a basis e.g. its reference to decisions made on the adequacy of the level of protection provided (Article 45), utilising standard agreement clauses and following other data protection measures in accordance with the GDPR.

### **7. Period for which personal data is retained**

Personal data is retained for as long as is necessary in relation to the purposes for which it was collected and processed or for as long as is required by law or regulation.

The storage of data on Aalto University staff and students follows the applicable privacy notices as well as the university's data management plan.

Images containing personal data are processed as other data, i.e. in accordance with the privacy notice on personal data.

Marketing and communications material is retained until the person who is the subject of the material requests its erasure.

Participant lists compiled separately for an individual event and data related to the lists will be retained for a maximum of one (1) year after the conclusion of the event. Aalto University partners who received personal data related to an event are required to destroy that information after the conclusion of the event.

If the participant list is required to be attached to billing information due to services provided at the event or for any other reason, the information will be retained for at least six (6) years from the end of that calendar year.

Billing and other bookkeeping data on an event is retained for at least six (6) years after the end of the calendar year in which the event occurred.

### **8. Rights of the data subject concerning personal data**

You have rights over the personal data in Aalto's possession when Aalto is the controller of the data.

If you wish to exercise your rights, your request will be evaluated according to the situation as requests are evaluated on a case-by-case basis. Please be aware that we may also retain and use your personal data when necessary for compliance with legal obligations, dispute resolution or the fulfilment of contracts.

**A) Right of access by the data subject**

You have the right to acquaint yourself with personal data on yourself that is in the possession of Aalto University.

**B) Right to rectification**

You have the right to rectify inaccurate or incomplete data.

**C) Right to erasure**

You have the right to request erasure of the personal data ('the right to be forgotten') in the following cases:

- You have the right to have a photograph of yourself erased from the Aalto University website.
- You object to the processing of your personal data when there is no legitimate grounds for the processing.
- The processing of the personal data is unlawful.

In many cases, Aalto University has a responsibility to retain personal data, e.g. for reasons of legal obligation.

**D) Right to restriction of processing**

If you contest the accuracy of the personal data or the lawfulness of the processing, or if you have exercised your right to object to the processing, you may request that Aalto University restrict the processing of the personal data to storage only. The processing of the data is then confined to its storage only until, for example, the accuracy of the data is verified.

If you do not have the right to request erasure of the data, you may request instead that Aalto University limit its processing to only that needed in order to retain the data.

**E) Right to object to processing where Aalto University has a legitimate interest**

You always have the right to object to the processing of the personal data when the processing is for marketing purposes, for example.

**9. Right to receive notice of a security breach of your personal data**

We have an obligation to communicate personally any security breach of personal data to those data subjects whom the breach concerns. The right enters into force if the breach may likely result in a high risk to the rights and freedoms of the individual, e.g. in the form of identity theft, payment fraud or other criminal activity.

An information security team operates at Aalto (email: [security\(at\)aalto.fi](mailto:security(at)aalto.fi)) to process reported data security and privacy protection incidents concerning the university and to help resolve them, investigating whether data breaches have occurred.

**10. Controller, person responsible and contact details**

The controller is Aalto University.

The person responsible for communications and events is the communications director.

A contact person and person responsible is designated for each event and newsletter. The contacts details are given in connection with each event announcement, invitation or newsletter.

## **11. Exercise of rights**

Requests concerning personal data may be submitted as service requests to: viestintä@aalto.fi.

If you have questions regarding this privacy notice, or questions or requests regarding the processing of personal data, you may contact the Aalto University data protection officer:

- In charge of data protection: Jari Söderström
- Tel. (exchange): 09 47 001
- Email: dpo@aalto.fi

If you, the data subject, consider the processing of your personal data to be an infringement of privacy protection legislation, you have the right to lodge a complaint with the data protection ombudsman ([www.tietosuoja.fi](http://www.tietosuoja.fi)), which is the supervisory authority.

## **12. Your responsibility**

You are responsible for the information you supply or make available to Aalto University recipients, and you must ensure the accuracy of the information.

## **13. Personal data and principles of privacy protection**

Due diligence is observed in the processing of personal data and data security measures are followed as appropriate. Technical solutions such as firewalls and encryption are employed and they comply with current standards. The controller ensures that retained information, user permissions and other data critical for the security of personal data are processed according to instructions, confidentially and only by individuals whose job descriptions authorise the processing.

## **14. Amendments to the privacy notice**

Updated versions of this notice will show the date of the new version at the beginning of the document. If we make changes to content of this notice, we will take appropriate measures to keep you informed in a manner consistent with the significance of the change.