**Privacy notice for eSupport**

This privacy notice describes how your personal data is processed when you use the eSupport system for IT service requests and incident in the capacity of a customer or in that of a person handling the service request (‘service request fulfiller’).

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

**Purpose and legal grounds for processing your personal data when you use eSupport as a customer**

Your personal data is used to identify you and to fulfil your service request. Your personal data will be used only to communicate on matters related to the service, identify solution and application owners and fulfil your service requests and develop our services.

In service requests related to licences, your personal data is used to fulfil a service request and to identify the licence owner and application owner for the purposes of the licence listing.

As regards Aalto employees, personal data is processed primarily on the basis of the university’s legitimate interest based on the employment relationship between Aalto and the employee.

The data collected from the eSupport requests is also used for scientific research purposes. In such cases, personal data is pseudonymised or anonymised. The legal basis for processing of personal data in those cases is its necessity for the performance of a task carried out in the public interest, i.e. scientific research.

**Purpose and legal grounds for the processing of your personal data when you use the eSupport system as the service request fulfiller**

The eSupport register is used to collect data on the amounts and types of service requests fulfilled by individual service request fulfillers on a monthly basis and to compile statistics for Aalto University use.

If the customer gives feedback on the service, expresses a wish to be contacted in the issue, and mentions the service request ID in the feedback, it is possible to identify person responsible for fulfilling the service request. Feedback without contact requests cannot be connected to a specific service request. Any feedback with a contact request is forwarded to the immediate supervisors of IT customer service.

The numbers of service requests fulfilled by an individual employee is monitored provided their principle task is fulfilling service requests.

Based on the eSupport register kept of service requests, summaries concerning individual
employees are discussed annually in employee objective and development discussions (‘My dialogues’) and as necessary, in other discussions with the supervisor. The numbers of service requests fulfilled by teams are monitored at the team level in the case of teams whose principle task is the fulfilling of service requests. Team-level summaries of service requests are reviewed by the team’s immediate supervisor and the service manager. The data concerning an individual employee may be processed by the service director and the supervisor of the employee as part of their duties; this right, based on the employer’s right to direct and supervise, has been dealt with as part of the cooperation negotiation concerning IT services.

As the employer, Aalto University needs personal data produced by the eSupport system to maintain and develop processes related to Aalto University operations, collect feedback, compile statistics and reports as well as to manage human resources and perform supervisor duties.

As regards Aalto employees, personal data is processed primarily on the basis of the university’s legitimate interest based on the employment relationship between Aalto and the employee.

The data concerning employees who process the eSupport service requests and incidents are also used for scientific research purposes. In such cases, personal data is pseudonymised or anonymised. The legal basis for processing of personal data in those cases is its necessity for the performance of a task carried out in the public interest, i.e. scientific research.

Anonymised data does not constitute personal data.

**What personal data does Aalto University collect?**
The personal data processed by the university may be divided into the following categories:

1. Data concerning persons:
The eSupport service contains data on
   a) customers
   b) service requests sent to the service desk
   c) service request fullfillers
   d) owners and persons responsible for software licences

   Personal data is used for reporting purposes for a maximum of one year after its collection.

2. Details of cases processed by the service desk (data concerning the service request)
   - The description of the request written by the customer (may contain personal data)
   - Communication related to fulfilling the service request, additional information and the solution presented to the customer (notifier, service request ID, description of problem/need, status, person in charge, urgency level, date of processing, classification by service category)
   - Measures related to fulfilling the request, such as commenting on it, delegating it to
another specialist, asking for additional information from the customer or a third party, providing a solution, closing the service request.

3. Identifying data concerning the customer
- first name and last name
- email address
- work telephone number
- department
- location of workstation
- any previous service requests from the customer

If the customer is a party external to the university community, the email address and the name associated with it is saved into the system.

4. Identifying data concerning the service request fulfiller
- first name and last name
- email address
- fulfilled service requests
- pending service requests assigned to individual service request fulfillers.

5. Identifying data concerning both the contact persons and the persons responsible for software licences owners
- first name and last name
- email address
- work telephone number
- department
- location of workstation
licences owned by the person or licences for which they are given as contacts The intranet of the university contains a licence list, which shows the names of contact persons in the format in which they are collected from eSupport.

Data provided by the customer and the service request fulfiller in connection with the request The personal data of both the customer and the service request fulfiller are transmitted automatically from the Active Directory, which retrieves data from the Aalto University information systems Oodi and Workday.

The person’s email address is entered automatically with the service request based on the address from which the request came or it is entered manually by IT customer service. Service requests can be sent by email and email addresses are also used as login information when a user logs in to the portal.

The person processing the service request is identified in connection with his or her log in, and
the actions taken are saved along with the processor’s name and the time the actions were performed.

**Parties to whom Aalto may disclose your personal data**

I) Service providers that process your personal data
   - Microsoft cloud services
   - CSC – IT Center for Science cloud services

II) Recipients who together with Aalto determine the processing of your personal data
   - Microsoft cloud services
   - CSC – IT Center for Science cloud services

**Transfer of personal data to third countries**

The data protection policy of the university specifies that particular care is to be exercised if personal data is transferred outside the EU and the EEA to countries that lack the same level of data protection as is required by the European General Data Protection Regulation (GDPR). Transfers of personal data outside the EU and EEA are done using standard agreement clauses in accordance with the requirements and other data protection measures of the GDPR.

**How does Aalto University protect personal data?**

Protecting personal data is important to Aalto University. Aalto University has implemented appropriate technical and organisational and administrative measures to ensure data security and to protect all personal data against loss, abuse, unauthorised use, disclosure, alteration or destruction. The eSupport system is used in accordance with the Aalto University information security principles. Those members of the Aalto community who are not members of the Aalto IT staff can only see their own service requests by logging in with their Aalto IT account. IT staff see all service requests. Greater access rights are granted only when necessary for a work task. A listing of access rights is available from the system. To protect the user (data subject), certain eSupport service events, such as breaches of data security, and requests involving HR and study affairs, are processed in the system through a secure connection in which their visibility is limited as needed.

**How long is your personal data stored?**

Data is stored in accordance with the data management plan of the university and the requirements of Finnish legislation regarding activities and services. The services are described in the privacy notices for staff, students and IT services.

**Updates to the privacy notice**
Your rights related to personal data

You have rights relating to the processing of personal data at Aalto. The scope of your rights is tied to legislation and the grounds for the processing. The EU General Data Protection Regulation and national law may allow exceptions to your rights as a data subject.

A) Right of access

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

B) Right to rectification

You have the right to request rectification of inaccurate or incomplete data.

C) Right to erasure

You have the right to request erasure of data.

However, in many cases Aalto University has a responsibility to store personal data for reasons of legal obligation.

D) Right to restriction of processing

If you contest the accuracy of the personal data we have collected on you or the lawfulness of the processing, or if you have exercised your right to object to the processing, you may request that we restrict the processing of the 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 or until a review is conducted of whether our legitimate interests override your interest. 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 store the data.

E) Right to object to processing personal data when the processing is based on legitimate interest

You always have the right to object to the processing of personal data for direct marketing purposes.

If you wish to exercise your above-mentioned 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 store and use your personal data when necessary for dispute resolution, the performance of contracts or Aalto’s compliance with its legal obligations.

1. How to use your rights

The controller is Aalto University. Our aim with this document has been to provide a clear description of our processing of personal data. We have not succeeded in that aim if some part
of the document remains unclear about how we carry out the processing. In such cases you may send questions for more detail from the contact person and data protection officer mentioned below.

The contact person in matters concerning eSupport services is Anne Keränen.

If you as a data subject have questions or requests regarding the processing of personal data, you may contact the Aalto University data protection officer.

Data protection officer: Anni Tuomela

Tel.: (exchange) 09 47001

Email: dpo@aalto.fi

If you 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), which is the supervisory authority.