

**Privacy notice to the registered**

This notice provides information required by the EU General Data Protection Regulation (Articles 13 and 14)

	Aalto University's electronic document and records management system (SAHA), as well as the university's long-term or permanently archived records.
<b>Date:</b>	10.9.2020
<b>Registrar, contact person and person in charge of the register</b>	<p>Aalto University foundation sr          Mail address: PL 11000, 00076 AALTO          Visiting address: Otakaari 24, 02150 Espoo          Phone number: 09 47001</p> <p>Person responsible:          Susanna Kokkinen          Manager, Records Management  <a href="mailto:etunimi.sukunimi@aalto.fi">etunimi.sukunimi@aalto.fi</a></p>
<b>Privacy officer and contact information</b>	<p>Aalto University Data Protection Officer:          Anni Tuomela          Mailing address: PL 11000, 00076 AALTO          Visiting address: Otakaari 24, 02150 Espoo          Phone number: 09 47001          Email: dpo@aalto.fi</p>
<b>Purpose of the collection of personal data and legal basis for the processing of personal data</b>	<p>The purpose of processing personal data is to register correspondence, decision-making and other key matters and records belonging to Aalto University's tasks for monitoring purposes in accordance with the university's records management plan.</p> <p>The university's long-term and permanently archived records contain, in addition to the case register, archive collections collected for research purposes, which are formed in accordance with Aalto University's records management plan.</p> <p>The archived collections describe the university's activities, incl. research and teaching.</p> <p>Aalto University's right to process the data of the data subject is based on the Act on the Openness of Government Activities (621/1999) and the data is processed as required by data protection legislation.</p>

<b>A: Personal data is collected directly from the registrant</b>	<p>Yes</p>
<b>B: Personal data is collected from sources other than the registered</b>	<p>Yes</p> <p><b>Electronic document and records management system SAHA's</b> data is mainly collected from records received by the university and created at the university, from customers and users of the system.</p> <p>The system's user information is automatically updated from Aalto University's Active Directory (AD). The source registers are Aalto University's student information system Oodi and the HR information system Workday.</p> <p>Some of the management decisions of Aalto University are created using Nintex workflow for Sharepoint form, in which all decision metadata and content are entered. Metadata stored on the form is transferred to Frends integration platform, in where a PDF document is created, and it is transferred to Telia sign signature service for electronic signing. Telia Sign attaches an electronic signature certificate and the signatory's first and last name to the document according to the certificate of Digital and Population Data Service Agency. Frends receives a signed document and transfers it and its metadata to SAHA.</p> <p>Research projects' personally identifiable information (project name, project number, party name and country of origin information, as well as first and last name of the accountable manager of the project) will be automatically updated from Aalto University's partnerships management system CRM. The source registers of CRM are Raindance and AD.</p> <p>The defined metadata of Aalto Startup Center (ASUC) agreements (name of the Startup, ASUC contact person and the signatory's first and last name) are updated to SAHA from Aalto University's partnerships management system CRM through the agreement form. Metadata collected to the agreement form is transferred to Frends integration platform, in where a PDF document is created, and it is transferred to Telia sign signature service for electronic signing. Telia Sign attaches an electronic signature certificate and the signatory's first and last name to the document according to the certificate of Digital and Population Data Service Agency. Frends receives a signed document and transfers it and its metadata to SAHA.</p> <p><b>Aalto University's long-term or permanent personal register</b> data contained in systems other than electronic document and records management system are collected and will be archived in the manner mentioned in the data protection notice of each activity in accordance with the university's records management plan.</p>
<b>Data content of the material (description of</b>	<p>Electronic document and records management system SAHA processes the following necessary personal information, which includes, but is not limited to, the following:</p>

**registered groups and personal data groups)**

Records concerning the registration or registration of clients of the Registry Office shall be registered as personal data:

- First and last name of the sender and recipient
- Customers can be Aalto University staff, students or the so-called persons outside the house.

With regard to Aalto University's own records, the following are registered as personal data:

- First and last name of the draftsman and signatory of the document

The credentials of registered users of the system include the following information:

- User's first and last name, title, unit, and email address.
- Date and time of the change in addition to the identification information made by the user.

Assignment made in the system automatically creates an e-mail which is sent to the receiver of the assignment. The data collected from this assignment is automatically entered on the basis of user data or manually entered by the user with the names and e-mail addresses of the sender and recipient.

The assignment is recorded in the case information (name of the processor and / or recipient, e-mail address, date and time of the operation).

**Aalto University's long-term or permanently archived collections** are formed in accordance with the university's records management plan, and the personal registers they contain are formed in the manner mentioned in the data protection notice of each activity and their related systems.

Permanently maintained personal registers consist of Aalto University staff, researchers and students.

**Recipients or groups of recipients of personal data (= transfers)**

The information is processed only by those Aalto University employees or persons acting on behalf of Aalto who have the right to process personal data.


There is an integration concerning public and publishable document from SAHA to aalto.fi web page, which is restricted to the Aalto community. Defined public and publishable decisions and other documents are searchable through a link from SAHA. The interface doesn't release partially confidential, confidential or other non-publishable content. These documents contain first and last name of the decision maker and preparer, and in some cases first and last name of the person concerned in the decision (i.e. decision on appointing a professor).

There is an integration concerning Aalto Startup Center (ASUC) agreements from SAHA to the Customer Relations Management service where there is a link to the agreement document. ASUC contact person's and signatory's first and last name are in the agreement.

In principle, personal data will not be disclosed from the system or archives except to the parties concerned.

	<p>However, personal data may, if necessary, be disclosed to public authorities and used for research purposes.</p>
<p><b>Data transfers to third countries</b></p>	<p>Personal data contained in electronic document and records management system SAHA or Aalto University's long-term or permanently archived collections will not, in principle, be transferred outside the EU and the European Economic Area (EEA) to countries that do not provide data protection under the EU General Data Protection Regulation.</p>
<p><b>Retention period / determination criteria for personal data</b></p>	<p>Retention periods of personal data and manual data stored in the systems are based on applicable law and Aalto University's records management plan.</p> <p><b>For electronic document and records management system SAHA, the retention periods for personal data are:</b></p> <p>Permanently archived data:</p> <ul style="list-style-type: none"> <li>• Metadata of all opened items is permanently preserved, incl. first name and last name of the principal (customer)</li> <li>• Information on SAHA handlers of all open cases – first name, last name and e-mail information are archived permanently</li> <li>• The metadata of the draftsman and the signatory, as well as the first name and last name of the potential customer, remain as personal data of the metadata of the permanently archived records.</li> </ul> <p>Processes with non-permanent retention period, possibly containing personal information:</p> <ul style="list-style-type: none"> <li>• Notification of appointment of occupational safety and health representative (retention period 50 years, public)</li> <li>• Reports concerning equality (retention period 50 years, public)</li> <li>• Handling of criminal cases (retention period 15 years, partially confidential, Act on the Openness of Government Activities § 24.1 § 19)</li> <li>• Disputes (retention period 15 years, partially confidential, Act on the openness of Government Activities § 24.1 § 19)</li> <li>• Matters concerning Administrative Procedure Act (retention period 15 years, partially confidential, Act on the Openness of Government Activities § 24.1 § 19)</li> <li>• Processes concerning Labor law (retention period 6 years, partially confidential, Act on the Openness of Government Activities § 24.1 § 32)</li> <li>• Complaints (retention period 15 years, confidential until the case is resolved)</li> <li>• Disciplinary proceedings, students (retention period 10 years, documents become public at the end of the process)</li> <li>• Inspection of registered personal data (retention period 6 years, public)</li> <li>• Decision-making concerning requests for information (retention period 15 years, public)</li> <li>• Processes concerning suspected data breaches (retention period 10 years, public)</li> </ul>

	<ul style="list-style-type: none"> <li>• Appeals for revised decisions: student admission (retention period 10 years, public)</li> <li>• Appeals for revised decisions: changes in the study rights, (retention period 10 years, partially confidential, Act on the Openness of Government Activities § 24.1 paragraphs 23 and 25)</li> <li>• Appeals for revised decisions: credits (retention period 10 years, partially confidential, Act on the Openness of Government Activities § 24.1 § 30)</li> <li>• Appeals for revised decisions: credit transfer (appeals to the Academic Appeals Board); thesis evaluation (retention period 10 years, partially confidential, Act on the Openness of Government Activities § 24.1, paragraphs 25 and 30)</li> <li>• Changes to study rights (retention period 10 years, public)</li> <li>• Suspected breach of research integrity (retention period 10 years, decision is public, other documents partially confidential, Act on the openness of Government Activities § 24.1 § 21)</li> <li>• Joint-funded research collaboration and general research collaboration (retention period 20 years, confidential, Act on the Openness of Government Activities § 5, paragraphs 3 and 4). Contract research (retention period 10 years, confidential, Act on the Openness of Government Activities § 5, paragraphs 3 and 4). Agreements on assignment of rights (retention period 150 years, confidential, Act on the Openness of Government Activities § 24.1, paragraph 17)</li> <li>• Startup agreements (retention period 150 years, public)</li> </ul> <p>Data and records collected from other systems than document and records management system is part of <b>Aalto University's long-term or permanently archived collections</b> is collected in accordance with Aalto University's records management plan.</p>
<p><b>Principles of material protection</b></p>	<p>A. The manual records are primarily stored in Aalto University archives, which is accessible only to those entitled to the information. Prior to the final transfer to the archives, some of the records will be stored locally by the Aalto University unit responsible for compiling the records, to which access is restricted to those entitled to the information.</p> <p>B. The electronically stored information and records are stored in Aalto's service (SAHA, Product Name Tweb), which is provided by Triplan Oy. Access to the records in the service is restricted to those entitled to information. The servers are located in Aalto's data center in Finland. Access to the servers is restricted to IT experts who maintain the service and servers on the part of Aalto and the supplier. Access is restricted by network security and personal IDs and passwords.</p>
<p><b>Rights of the data subject</b></p>	<p>A person has the right to know whether the university processes personal data concerning him or her. The data subject has the right to inspect and gain access to his or her personal data, to request rectification, deletion, transfer, restriction of processing of his or her personal data and to object to the processing of his or her personal data. Requests can be made at <a href="https://datarequest.aalto.fi/fi-FI/">https://datarequest.aalto.fi/fi-FI/</a></p>



The data subject has the right to submit for evaluation the legal basis of the university's data protection activities to the Office of the Data Protection Ombudsman tietosuoja@om.fi