

Aalto University

Privacy notice for students

General Data Protection Regulation (EU) (2016/679), Articles 13 and 14

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| Name: | The personal counselling clients of the psychologists of Aalto University's Learning Services |
| Date: | 10 February 2022 |
| Controller, unit in charge: | Aalto University Aalto University Foundation Postal address: P.O. Box 11000, FI-00076 AALTO Street address: Otakaari 24, FI-02150 Espoo Tel.: (exchange) +358 9 47001 Head of Learning Services Eija Zitting |
| Short description | |
| A: Is the personal data collected directly from data subject? | Yes |
| B: Is personal data collected from a source other than the data subject? | Yes |

1. Contact details of unit in charge

Learning Services, Student Services;
Saara Maalismaa, Manager of Student Services,
saara.maalismaa@aalto.fi, tel. +358 50 411 1271

2. Data protection officer and contact details

Legal Counsel Anni Tuomela, Aalto University
Postal address: P.O. Box 11000, FI-00076 AALTO
Street address: Otakaari 24, FI-02150 Espoo
Tel.: (exchange) +358 9 47001
dpo@aalto.fi

Students may contact the Aalto University data protection officer if they have questions about the university's data protection policies, this privacy notice or other matters concerning the processing of personal data at Aalto University.

3. Purpose of and legal grounds for the processing of personal data

Personal data is processed for the purpose of providing Aalto University's bachelor's, master's and doctoral degree students with personal counselling services by the Learning Services psychologists. Personal counselling services support the university's statutory educational duties by furthering students' well-being while studying and supporting their employment.

Students' personal data is processed in connection with the booking of personal counselling appointments; during face-to-face, remote and chat counselling appointments; and when writing summaries and certificates of visit for the students upon their request.

Statistical summaries and reports are produced on the use of the service, for example on the number of clients and background information. Individual students cannot be identified from the statistical summaries or other reports.

The primary legal basis for the processing of personal data is the performance of a task carried out in the public interest.

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 (General Data Protection Regulation, Article 6(1)(e))
- on the necessity to comply with a legal obligation (Article 6(1)(c))
- on the consent given by the data subject and, in certain cases, when necessary for the performance of a contract (Article 6(1)(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)(g)), or the processing of data is provided by law or derives directly from a statutory duty set out for the controller by law (section 6(1) of the Finnish Data Protection Act (1050/2018)).

Main statutes:

- Universities Act (558/2009) and the decrees given under it
- Government Decree on University Degrees (794/2004) as amended and any prior decrees concerning degrees in science and technology, business, and art and design
- Act on the National Registers of Education Records, Qualifications and Degrees (884/2017, chapter 5)
- General Data Protection Regulation (EU) 2016/679 and supplementary national legislation
- Act on the Openness of Government Activities (621/1999)

4. A legitimate interest of the controller or third party (applies only to Case A; processing is based on Article 6(1)(f))

No.

5. Categories of personal data

The following categories of students' personal data are processed by Learning Services' psychologists during the provision of personal counselling services.

Appointment booking

Personal and contact information: student name, Aalto email address, telephone number
 Background information: school, degree, programme/major, the year the student started studying, doctoral students' employment situation
 Information on the student's use of the service: requested channel of communication, the reasons for contacting Aalto's psychologists, booked appointments

Chat counselling

Personal and contact information: student name, Aalto email address
 Information on the student's use of the service: the chat conversation

Counselling

Personal and contact information: student name, Aalto email address

Information on the student's use of the service: appointment records containing the main points of discussed during counselling and a mutually agreed goal for the counselling process and an evaluation of the progress of the counselling process. If the counselling is provided as a video call: sound and image.

Summaries and certificates of visit

Personal and contact information: student name

Information on the student's use of the service: information necessary for the purpose of its intended use (e.g. documents to Kela)

A feedback form to be filled in under the student's own name at the end of the counselling appointment or on Ninchat after the chat counselling appointment

The form contains the following information: A description of the problem for which the student sought counselling and quality of counselling.

Information that may contain special categories of personal data (sensitive data):

Information on the student's need for and use of the personal counselling service, the information provided the student when contacting the psychologists, and appointment records.

6. Recipients or categories of recipients of the personal data

Personal counselling clients' data can only be accessed by the psychologists of Aalto University's Learning Services. Information and data produced during counselling appointments (contact form, appointment records) are only processed by the psychologists who provide counselling services to the student in question.

Aalto University may also use outside parties to process personal data, such as system service providers that process personal data on behalf of Aalto on the basis of a commission contract.

Aalto University discloses personal data to parties outside the university or processes data for purposes other than the original purpose only in situations where such disclosure or processing is permitted by law.

7. Planned transfers of personal data to third countries or international organisations

None.

8. Protection of personal data and the storage period of personal data and the criteria used to define that period

All stored data is protected. Secure communication channels are used when communicating electronically. Students log in to the service using their Aalto username. All data is stored encrypted. Logs are kept for all processing of personal data.

Persons in the service of the university and elected officials are bound by a non-disclosure obligation under section 23 of the Act on the Openness of Government Activities (621/1999). Secret information and its storage periods, archiving and destruction are defined in the university's Records Management Plan. No image or sound is recorded during remote counselling. Copies of chat discussions are stored during the meeting. Information related to appointment booking, counselling and the summaries and certificates of visit drawn up for students are stored for a maximum of four (4) years.

9. Right of access by the data subject, right to rectification, right to erasure, right to restrict processing and right to data portability (Articles 15,16,17,18 and 20 of the General Data Protection Regulation)

The student may submit any requests related to their rights to access information as a data subject as an encrypted email to: psychologist@aalto.fi

Right of students to access their data

Students have a right to know what personal data concerning them is being processed and what data concerning them has been saved. The student may submit an information request to the university. In such cases, the following procedure is to be followed:

- The university provides the information requested without undue delay. The person making the request must prove their identity upon request. The university has to provide the requested information or the additional information related to the request no later than one month after receiving the request. If the information request is complex and comprehensive, the deadline may be extended by two months.
- As a rule, the university will provide the information free of charge. For any further copies requested by the student, the university may charge a fee based on administrative costs. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the university may either charge a fee based on administrative costs or refuse to act on the request. The university shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request.
- If the university does not provide the information requested, the student will be provided with a written account of the matter. The written account will also include an explanation of the student's rights to judicial remedies, for instance, the right to lodge a complaint with the supervisory authority.

Right of the student to rectification of data

- The student has a right to have any inaccurate or incomplete personal data concerning them rectified or completed without undue delay. In addition, the student has a right to demand that all personal data concerning them that is no longer needed be erased.
- If the university does not accept the data subject's request for rectifying their personal data, the data subject will be given a written account specifying the reasons for rejecting their request. The written account will also include an explanation of the student's rights to judicial remedies, for instance, the possibility of lodging a complaint with the supervisory authority.

Student right to erasure of data

- Depending on the legal basis, the student may have a right to have their personal data erased from the register of the school. This right shall not apply to cases where data processing is necessary for compliance with a legal obligation or for a task carried out in the exercise of official authority vested in the school. The storage and erasure of data shall comply with the records management plans of the university and the data storage periods required by legislation.

Right to restrict processing

- In certain situations, students may have the right to restrict the processing of their personal data until the legal basis for the data or their processing has been duly checked and rectified or completed.

Right to data portability

- The right to data portability means that the data subject shall have the right to receive the personal data concerning them, which they have provided to the university, in a structured, commonly used and machine-readable format and have the right to transmit the data to another controller without hindrance from the university. This right shall apply only to situations where the processing is carried out by automated means and is based on consent or contract.
- This right shall not apply to cases where data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official

authority vested in the controller. As a result, this right shall not apply, as a general rule, to the personal data files of the university.

10. Right of the data subject to object to processing of personal data (General Data Protection Regulation, Article 21)

The student may submit any requests related to their rights to access information as a data subject to: psychologist@aalto.fi

Right to object to the processing of personal data

- The student shall have the right to object, on grounds relating to their particular situation, at any time to the processing of personal data concerning them when the processing is based on the performance of a task carried out in the public interest or in the exercise of official authority or the legitimate interest of the university. In such cases, the university shall no longer process the personal data unless the university is able to demonstrate compelling legitimate grounds for the processing.
- Where personal data is processed for direct marketing purposes, the student shall have the right to object at any time to the processing of personal data concerning them for such marketing.

11. Right of the data subject to withdraw consent

- In situations where the processing of personal data is based solely on consent, the student shall have the right to withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

12. Right of the data subject to lodge a complaint with a supervisory authority

- The student shall have the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data relating to them infringes the General Data Protection Regulation (EU) 2016/679. In addition, the student has a right to use other administrative or judicial remedies. Additional information: <https://tietosuoja.fi/en/home>
- The student shall have the right to bring proceedings against the controller or the organisation processing the personal data before a court if the student considers that the processing of their personal data infringes the General Data Protection Regulation.

13. Is the provision of personal data a statutory or contractual requirement, or a requirement necessary to enter into a contract, and is the data subject obliged to provide the personal data? / What are the possible consequences of failure to provide such data?

The student shall provide all personal data necessary for the process in question and is responsible for their accuracy. In the case of several processes, personal data is often required in order for the process to take place.

14. Origin of personal data (when not received directly from data subject)

Entries made by psychologists. Identifiers retrieved from the university's register by the Ninchat service (Aalto email and name).

15. Processing of personal data for automated decision-making, incl. profiling

No.