

## **STUDENT EXCHANGE PROGRAM**

### **DATA PROTECTION STATEMENT - INCOMING STUDENTS**

Date: 4 January 2022

Aalto University is committed to protecting your personal data. Your personal data are kept confidential and processed in accordance with the provisions of the applicable data protection laws. Pursuant to Article 13 of the General Data Protection Regulation (EU 2016/679), we hereby inform you about the processing of personal data necessary to enable implementation of the student exchange.

Your personal data will be used to administer your mobility period at Aalto i.e., process your application, approve your study plan, for contacts related to your studies or mobility period, when sending you or your home university a transcript of records after the mobility period. Your personal data is also used for reporting to institutions that grant student mobility funds for universities, such as the Finnish National Agency for Education and the European Commission.

Aalto University discloses personal data to parties outside the university or processes data for purposes other than the original only in situations where such disclosure or processing is permitted by law. More information is available at Aalto University [Privacy Notice for students](#) and [Moveon Privacy Notice](#)

Student exchange is based on bilateral student exchange agreement between Aalto University and the partner university (the parties) to enable exchange of students (data subject) by waiving tuition fees.

It is stated in the bilateral student exchange agreements that both parties shall take all necessary measures required by the legislation to ensure confidentiality and protection of personal data and agrees to use and/or process the personal data only for the purpose that is necessary for managing and administering the exchange programme.

### **CONTACT INFORMATION**

Controller: Aalto University

Aalto University Foundation  
Postal address: P.O. Box 11000, FI-00076 AALTO  
Street address: Otakaari 24, 02150 Espoo  
Tel.: (exchange): 09 47 001  
<https://www.aalto.fi/en/services/privacy-notices>

Contact: Student Exchange Coordinators, Learning Services  
Email: [studentservices@aalto.fi](mailto:studentservices@aalto.fi)

If you have questions regarding this privacy notice, or questions or requests regarding the processing of personal data, you may contact

Contact: Anni Tuomela, Data Protection Officer  
Email: [dpo@aalto.fi](mailto:dpo@aalto.fi)

### **WHAT TYPE OF PERSONAL DATA IS PROCESSED IN THE STUDENT EXCHANGE APPLICATION?**

Student's home university selects and nominates the student to Aalto University for exchange. After the nomination Aalto University provides the student with instructions on incoming student application. According to the application instructions student provides personal data directly to the Moveon Mobility Management system of Aalto University.

No sensitive data (i.e., health, religion) will be transferred from the home university to Aalto University.

The data provided by the student is processed for the admission purposes to evaluate that the student meets the program specific requirements. As a result of the admission process student receives the decision of being accepted/not accepted to study an exchange period at Aalto University. The application information depends on the field of study and may include, for example:

1. personal data (student's name, date of birth, gender, nationality and passport number)
2. contact details (address, e-mail address; telephone number and in-case-of-emergency (ICE) contact details)
3. home university, e.g., university's name, country, contact person
4. information on studies (level, degree program, major, grade point average, transcript, language skills).
5. Information on the mobility program and length of stay
6. Bank account details (for students receiving a grant from Aalto University)
7. Study plan
8. Possible special arrangements concerning the mobility period
9. Expression of interest/motivation to study at Aalto University on exchange.
10. CV, copy of passport, copy of transcript and language certificate as attachments

#### **WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR DATA?**

Article 6, EU GDPR, "Lawfulness of processing"

1. Processing shall be lawful only if and to the extent that  
(c) processing is necessary for compliance with a legal obligation to which the controller is subject.

The data you provide on the student exchange application will be processed solely for the student exchange administration.

Aalto University and the partner university are parties in student exchange agreements, which are required for an exchange of students. Processing limited amount of personal data is necessary to perform the agreement and implement the student exchange for which the student has applied.

#### **DOES THE PROCESSING INVOLVE AUTOMATED DECISION-MAKING?**

No, no automated decision-making (including profiling) is involved.

#### **ARE YOU OBLIGED TO PROVIDE YOUR PERSONAL DATA?**

Applying for exchange is voluntary, but in order to place on application to study at Aalto University on exchange you must provide us with the data that are necessary for the admission process. Otherwise, we are not able to admit you to study at Aalto University.

#### **IS YOUR PERSONAL DATA TRANSFERRED FROM AALTO UNIVERSITY TO YOUR HOME UNIVERSITY?**

Aalto University may transfer your academic records (transcript) to your home university in compliance with the obligations of the bilateral student exchange agreement.

In addition, Aalto University is entitled to notify your home university of an emergency situation and, if you have violated the rules and regulations of Aalto University.

#### **IS YOUR DATA TRANSFERRED OUTSIDE EU/ETA (THIRD COUNTRIES)**

In order to implement obligations of the bilateral student exchange agreement between Aalto University and your home university, your personal data may be delivered to your home university, which is located outside EU/EEA.

The transferrable personal data to your home university comprises of your academic records and a certificate on the length of the mobility period. These may be delivered by mail and/or email.

Third countries with adequate levels of data protection: The following third countries offer adequate levels of data protection, based on adequacy decisions issued by the European Commission (Art. 45 of the GDPR): Andorra, Argentina, Canada, Faroe Islands, Guernsey, Isle of Man, Israel, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, and Uruguay. Please note that some of the European Commission's adequacy decisions exclude educational activities. An updated [list](#) is available here.

Third countries without adequate levels of data protection: To a partner university in a third country not covered by an adequacy decision, we transmit your data on the legal basis of Art. 49 1 b/c

(b) the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request;

(c) the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person.

#### **HOW LONG DO WE STORE YOUR DATA?**

Your personal data are kept mainly in an electronic form in the Moveon mobility management system, the Sisu Student Register database and the VIRTATA National data warehouse for higher education. Your personal data is stored according to the Aalto University's Record Management System.

#### **WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?**

You have rights over the personal data in Aalto University's possession when Aalto University is the controller of the data. More information is available at Aalto University's [Data Privacy Notice for Students](#)

As a data subject affected by these data processing activities, any time vis-a-vis Aalto University you have the right to information about and access to your data, correction or deletion of your data, restriction of data processing, data portability, and the right to object to the processing of your data.

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.