

STUDENT EXCHANGE PROGRAM

DATA PROTECTION STATEMENT – OUTGOING 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 program. 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 applicable legislation of the respective country 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-notice>

Contact: Student Exchange Coordinators, Learning Services
Email: studentservices@aalto.fi

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

Anni Tuomela, Data Protection Officer
Email: dpo@aalto.fi

FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA AND WHAT ARE THE LEGAL GROUNDS FOR PROCESSING?

Both Bachelor's and Master's degrees may incorporate studies abroad as defined in the curriculum. This comes directly from Aalto University's national mandate to strengthen internationalization of Finnish higher education (source: [Ministry of Education and Culture, Policies to promote internationalisation in Finnish higher education and research 2017–2025](#)). International studies are also in accordance with the national degree regulations, that require the university to provide students with opportunities to develop good language and communication skills to operate and collaborate in an international environment.

Aalto University offers exchange places at carefully selected international partner universities. Students who apply for these places must undergo a selection process, which requires that

applicants' personal data is processed for the administration of the student exchange program. For this purpose, we only process personal data that is necessary to facilitate the exchange.

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

We process the data that the student provides during the selection procedure. This includes, among others, the following categories of personal data: name, date of birth, student number, gender, nationality, contact information (email address, telephone number) and information on studies at Aalto University (degree program, number of semesters completed, grade point average in the relevant degree program, current transcript). In addition, it may include personal data provided in your CV (curriculum vitae), as well as data on your partner university preferences and your motivation for the exchange.

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 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 an application for student exchange, students must provide us with the data that are necessary for the selection process. Otherwise, we are not able to nominate the student for an exchange.

IS YOUR PERSONAL DATA TRANSFERRED TO THE PARTNER UNIVERSITY?

In the event of a successful application, you will be nominated by Aalto University to the partner university for which you have applied and been selected for. The amount of personal data to be transferred depends on the nomination requirements of the exchange university 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. information on studies (level of studies, study program, major, grade point average, certificate of language skills).

After the nomination, your exchange university will contact you directly providing you with instructions for incoming student application. You will then need to provide your personal data directly to the exchange university in accordance with the application instructions.

No sensitive data (e.g., health, religion) will be transferred from Aalto University to your exchange university.

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

In the event of a successful application for Aalto University's partner university in a third country, Aalto University will transmit the necessary amount of data, as described in this document, to the partner university in question.

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: In the event of a successful application for 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 a of the GDPR, which is your consent for the transfer.

You can object to the transmission of your data at any time. In such case, it is not possible for Aalto University to nominate you for exchange at the partner university, which means that you will not be able to participate in the student exchange program organized by Aalto University. The withdrawal of your consent after the nomination does not affect the legality of a preceding transfer of your personal data.

If we exceptionally need to transfer your personal data to a third country in a situation not covered by the consent, it is possible only if there is another legal basis for the transfer under the GDPR.

IS YOUR PERSONAL DATA TRANSFERRED FROM THE EXCHANGE UNIVERSITY TO AALTO UNIVERSITY?

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

The partner university is entitled to notify Aalto University of an emergency situation and, if you have violated the rules and regulations of your exchange university.

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 VIRTAN National data warehouse for higher education. Your personal data is stored according to the Aalto University's Record Management System (in Finnish).

More information is available at Aalto University [Privacy Notice for students](#) and [Moveon Privacy Notice](#)

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), which is the supervisory authority.