Data privacy notice for students
General Data Protection Regulation (EU) (2016/679), Articles 13 and 14

<table>
<thead>
<tr>
<th>Name:</th>
<th>The Aalto University student wellbeing survey</th>
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<td>Date:</td>
<td>30 January 2023</td>
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</table>
| Controller, unit in charge: | 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  
Eija Zitting, Head of Learning Services |

### Short description

| A: Personal data collected directly from data subject | Yes |
| B: Personal data collected elsewhere than from 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

Anni Tuomela, Legal Counsel, Aalto University  
Postal address: P.O. Box 11000, FI-00076 AALTO  
Street address: Otakaari 24, 02150 Espoo  
Tel. (exchange): +358 9 47 001  
tietosuojavastaava@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 and legal grounds for the processing of personal data

The purpose of the Aalto University student wellbeing survey is to gather information from Aalto University students on studying at Aalto University and on their self-concept as students. To allow the correct targeting of the survey as well as the categorisation, analysis and reporting of the responses, background information regarding the respondents will be collected from the
student register (Item 5). The responses serve as a basis for personal feedback to the respondents and provide the Aalto University schools and programmes with information on their students’ experiences. Any background information will not be used in formulating the feedback. The survey is part of the AllWell? programme of Aalto University.

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 (Article 6(1) point e)
• on the necessity to comply with a legal obligation (General Data Protection Regulation, Article 6(1) point c)
• on the consent given by the data subject and, in certain cases, when necessary for the performance of a contract (Article 6(1) points 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), point g).
• the processing is based on the provisions of an act or for a task or obligation to which the controller is bound by or on the basis of an act (section 6, subsection 1 of the Finnish Data Protection Act 1050/2018).

Main statutes
• Universities Act (558/2009) and the decrees given under it
• the Government Decree on University Degrees (794/2004) as amended and any prior decrees concerning degrees in science and technology, business, and art and design
• the act on national study and degree registers (laki valtakunnallisista opinto- ja tutkin-torekistereistä, 884/2017, chapter 5)
• the General Data Protection Regulation (EU) 2016/679 and its complementary national statutes
• the 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 point f of Article 6(1))

No

5. Categories of personal data

Aalto University processes the following personal data categories that apply to students when making a counter feedback for students and reports for Aalto schools and programmes:

Questionnaire form:
Identification data: e-mail address (used as identifier in the Webropol questionnaire)

Student responses to the following measures: Deep learning, strategic learning and surface learning. Relevance and quality of teaching. Feedback from teachers and support from fellow students. Self-efficacy as a student. Commitment to studies. Procrastination in studies. Self-compassion. Burnout risk: Stress and low study motivation. In addition, optional feedback in the student’s own words, with all identification data anonymised, is submitted to the learning services staff responsible for processing student feedback in the student’s school.

Background information from the student information system:
Identification data: student name, student number

Other information: gender, school, department, degree programme and major, preferred language and mother tongue, nationality, tuition fee liability. Total credits earned, credits earned in current academic year and average grade of completed courses. Current student status, number of terms enrolled as an attending and non-attending student, start date of studies and degree pursued.
6. Recipients or categories of recipients of the personal data

At Aalto University, the individual survey responses and personal data of students are processed only by persons who are responsible for the contents and technical implementation of the survey, and who are separate from the Aalto University schools and degree programmes. Information contained in the student register, as well as the student’s feedback concerning learning and teaching at Aalto or any other information the student has provided on his or her course completion at Aalto may be combined with the AllWell? survey data.

The Aalto University schools and degree programmes are given summaries of the responses of all students in a format that does not allow the responses of individual students to be identified. The open-ended feedback of each student is disclosed to the schools and degree programmes separately from the other responses of that student so that individual students cannot be identified.

As a rule, personal data is not disclosed outside Aalto University. The AllWell? survey data as well as the student register data, the student’s feedback on learning and teaching at Aalto, and any other information the student has provided on his or her course completion may be disclosed for scientific research purposes subject to the conditions laid down in legislation. The student’s consent is obtained before disclosing his or her data for scientific research purposes.

Any identifying data is removed from materials disclosed for scientific research purposes. Questionnaire is conducted in Webropol system.

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

None.

8. Period for which personal data are stored / Criteria used to determine the period for which data are stored

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 his or her rights to access information as a data subject to: allwell@aalto.fi

Right of students to access their data
Students have a right to know what personal data concerning them are being processed and what data concerning them have 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 requested information or the additional information related to the request must be provided 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 information shall be provided 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 him or her rectified or completed without undue delay. In addition, the student has a right to demand that all personal data concerning him or her that is no longer necessary be erased.

- If the university does not accept the data subject’s request for rectifying his or her personal data, the data subject will be given a written account specifying the reasons for rejecting his or her 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 him or her, which he or she has provided to the university, in a structured, commonly used and machine-readable format and have the right to transmit those 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 his or her rights to access information as a data subject to:** allwell@aalto.fi

**Right to object to processing of personal data**

- The student shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which 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 demonstrates compelling legitimate grounds for the processing.

- Where personal data are processed for direct marketing purposes, the student shall have the right to object at any time to processing of personal data concerning him or her for such marketing.

### 11. Right of the data subject to withdraw consent
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 him or her 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 his or her 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. Providing personal data is often necessary for completing a process task.

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

Information concerning students is collected directly from the following sources: Aalto University student information system

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

No