

## Aalto University

### Data privacy notice

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

<b>Name:</b>	Exploring Lifewide Learning Survey
<b>Date:</b>	13 April 2023
<b>Controller, unit in charge:</b>	<p>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</p> <p>Aalto University Executive Education Ltd. Street address: Runeberginkatu 14-16, 00100 Helsinki Tel. 010 837 3700</p> <p>Laura Sivula, Business Area Director, Lifewide learning Tomi Kauppinen, Head, Aalto Online Learning Ida Hyvärinen, Program Manager (Aalto University Executive Education Ltd.)</p>
<b>Short description</b>	Aalto University is conducting a survey to gather feedback on lifewide learning platform needs. The aim is to research user needs for personalized and engaging learning experiences, and to seek feedback from a diverse range of participants.
<b>A: Personal data collected directly from data subject</b>	Yes
<b>B: Personal data collected elsewhere than from the data subject</b>	No

#### Contact details of unit in charge

Aalto University Lifewide Learning  
Laura Sivula, Business Area Director, Lifewide learning  
[laura.sivula@aalto.fi](mailto:laura.sivula@aalto.fi) , tel. +358 50 384 7228

## **1. Purpose and legal grounds for the processing of personal data**

The purpose of the Exploring Lifewide Learning Survey is to gather information from Aalto University alumni and other learners on their perceptions of and experiences in learning and online learning platforms.

The right to process personal data as a controller is based

- On the necessity for the purposes of the legitimate interests pursued by the controller or by a third party (General Data Protection Regulation, Article 6(1) point f)
- 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) point e)
- On the necessity to comply with a legal obligation (General Data Protection Regulation, Article 6(1) point c)

Main statutes

- Universities Act (558/2009) and the decrees given under it
- The General Data Protection Regulation (EU) 2016/679 GDPR and its complementary national statutes
- The Act on the Openness of Government Activities (621/1999)

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

Yes: Aalto University Executive Education Ltd. employees working on the project.

## **3. Categories of personal data**

Questionnaire form:

Gender, nationality, language proficiency, country of residence, annual income, age, educational level, work status and experience, the responses to the survey

Identification data: e-mail address. The e-mail address is used as an identifier in the Webropol questionnaire for the optional focus group invitations. The email address provided by the respondent is not connected to the data given in the questionnaire form.

No sensitive personal data shall be collected.

## **4. Recipients or categories of recipients of the personal data**

At Aalto University, the individual survey responses and personal data of respondents are processed only by persons who are responsible for the contents and technical implementation of the survey.

As a rule, personal data is not otherwise disclosed outside Aalto University or Aalto University Executive Education Ltd. The Exploring Lifewide Learning Survey data may be disclosed for scientific research purposes subject to the conditions laid down in legislation.

The questionnaire is conducted in the Webropol system.

## **5. Planned transfer of personal data to third countries or international organisations**

None.

## **6. Period for which personal data are stored / Criteria used to determine the period for which data are stored**

- e-mail addresses for the focus group invitations 1 year
- data provided to the survey 5 years

## **7. Right of access by the data subject, right to rectification, right to erasure, right to restrict processing and object the processing**

### **Right to access and rectify data**

According to the GDPR, you have a right to know what information on yourself is stored in the personal data file. You have the right to request that any inaccurate or erroneous data on yourself be rectified without undue delay. If data you wish have rectified or erased is maintained by an Aalto partner, we will request that the partner take the appropriate measures.

### **Right to be forgotten, withdrawal of consent**

Barring certain exceptions, the GDPR guarantees your right to have your erased, or as it is termed, your right to be forgotten. However, this right does not obtain in cases where the university's right as the controller to process personal data is based on the university's obligation to perform tasks carried out in the public interest or in the exercise of official authority. If the processing of personal data is based on your consent, you may also withdraw your consent. In that case, you may submit a request to us to erase data concerning yourself from our system. If there is no other legal grounds for processing your data, we will erase it.

### **Right to restriction of processing**

If you contest the accuracy of the personal data or the lawfulness of the processing, or if you have exercised your right to object to the processing, you may request that the processing of the personal data be restricted to storage only. The processing of the data is then confined to its storage only until, for example, the accuracy of the data is verified. If you do not have the right to request erasure of the data, you may request instead that the controller limits its processing to only that needed in order to store the data.

### **Right to object to processing where the controller has a legitimate interest or public interest**

You have the right to object the processing of your personal data, on grounds relating to your particular situation, at any time to processing of your personal data which is based on legitimate interest or public interest or in the exercise of official authority.

### **Using the rights when data subjects are not identifiable**

If the processing purpose does not require, or no longer requires the identification of you, the controller shall not be obliged to obtain further information so that the data or you may be

identified only for purposes to able you to exercise your rights. If the controller is unable to link the data to you, you do not have the right to access or correct the personal data, object the processing, or delete the personal data. However, if you provide additional information that allows their identification from the collected data, the rights will not be restricted.

### **How do you use your rights**

You may submit any requests related to your rights to access information as a data subject to: [laura.sivula@aalto.fi](mailto:laura.sivula@aalto.fi)

Requests under the GDPR concerning the processing of personal data can be submitted through our personal data portal:

[Aalto university personal data portal](#)

Please note, however, that regular service addresses or contact person named in privacy notice for different services will still be used primarily for contact information changes and other routine changes.

You may also contact the data protection officer of Aalto University if you have questions or demands relating to the processing of personal data:

DPO: Anni Tuomela  
Phone: 09 47001  
Email: [dpo\(at\)aalto.fi](mailto:dpo(at)aalto.fi)

If you consider the processing of your personal data to be an infringement of data protection legislation, you have the right to lodge a complaint with the Data Protection Ombudsman, which is the supervisory authority. Read more:

[Home - Data Protection Ombudsman's Office \(tietosuoja.fi\)](#)