

28.06.2023

Privacy notice for the University Pathway Finland

1. Data collectors	<p>Aalto University Aalto University Foundation sr Postal address: P.O. Box 11000, FI-00076 AALTO Street address: Otakaari 24, 02150 Espoo, Finland</p> <p>Tampere University Tampere University Foundation sr Postal address: FI-33014 Tampere University Street address: Kalevantie 4, 33100 Tampere, Finland</p> <p>The University of Oulu Postal address: P.O. BOX 8000, FI-90014 University of Oulu Street address: Pentti Kaiteran katu 1, 90570 Oulu, Finland</p>
2. Contact persons	<p>Aalto University Project Manager Tiia Soininen, tiia.soininen@aalto.fi</p> <p>Tampere University Senior Specialist Terhi Kipinä, terhi.kipina@tuni.fi</p> <p>University of Oulu Service Manager Sanna Waris, sanna.waris@oulu.fi</p>
3. Data protection officers	<p>Aalto University dpo@aalto.fi</p> <p>Tampere University dpo@tuni.fi</p> <p>University of Oulu dpo@oulu.fi</p>
4. Name of the register	University Pathway Finland
5. Purpose of processing personal data and the lawful basis for processing	<p>Purpose of processing:</p> <ul style="list-style-type: none"> • To organise admission and teaching. • To manage and report statistically on completed courses. <p>Division of the processing of personal data:</p> <p>Aalto University Managing the University Pathway Finland programme (i.e Pathway programme), including admission to the Pathway programme, managing records and certificates.</p> <p>Aalto University, Tampere University and University of Oulu Implementing their part of the teaching</p>

	<p>and offering study counselling and support to students.</p> <p>Processing the same data when necessary: completed courses, processing of complaints by students.</p> <p>Lawful basis for processing:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Consent <input checked="" type="checkbox"/> Contract <input checked="" type="checkbox"/> Legal obligation <input type="checkbox"/> Vital interests of data subjects <input type="checkbox"/> Public interest or the exercise of official authority <input checked="" type="checkbox"/> Legitimate interests of the Data Controller <p>If the basis for processing is the <i>legitimate interests of the Data Controller</i>, describe the legitimate interests: Programme development needs such as feedback surveys in accordance with the principle of minimising the use of personal data; possible marketing and communication of educational services.</p>
<p>6. Contents</p>	<p>Aalto University processes the following data when managing admission to the Pathway programme:</p> <ul style="list-style-type: none"> ▪ Name ▪ Contact information (such as an address, phone number, and email address) ▪ Nationality ▪ Date of birth ▪ Passport or ID copy ▪ Prior education ▪ Home country ▪ Motivation letter ▪ Online entrance exam results and recorded oral exams ▪ Information on accepting the offer of admission to the Pathway programme (registration) ▪ Payment details <p>Aalto University, Tampere University and the University of Oulu process the following data when implementing their teaching:</p> <p>Identification information:</p> <ul style="list-style-type: none"> ▪ Individual identification data (name, personal identity number (when applicable), birthdate, username). ▪ Background information (such as gender, nationality, mother tongue and other language information)

	<ul style="list-style-type: none"> ▪ Contact details (address, phone number, and email address). ▪ University-specific ID, and password. <p>Information regarding the Pathway studies offered by the University:</p> <ul style="list-style-type: none"> ▪ Course attainments (incl. examination responses and other completed assignments used to assess course attainments) and their evaluation. ▪ Examination and course registrations and information on participation in teaching. ▪ Information on video-monitored electronic exam sessions. ▪ Guidance counselling and other student support services. <p>Special categories of data concerning students may be handled during processes involving:</p> <ul style="list-style-type: none"> ▪ Adjustments for a person with disabilities and study support ▪ Accounts and consequences of any aberrations in the student's studies or activities in the University environment. <p>Aalto University, Tampere University and the University of Oulu process records of completed courses offered by the respective universities. Aalto University processes records of the completed Pathway programme.</p>
<p>7. Sources of information</p>	<p>Applicants and students themselves.</p> <p>Other:</p> <ul style="list-style-type: none"> ▪ Online payment and registration services. ▪ University staff.
<p>8. Regular disclosure of data and recipients</p>	<p>Regular disclosure of data to third parties:</p> <p>Data exchange between universities</p> <p>Aalto University transfers the necessary identification data of the Pathway programme participants to Tampere University and the University of Oulu to arrange the teaching.</p> <p>Aalto University transfers the final records of the completed courses with grades to Tampere University</p>

	<p>regarding those Pathway students who apply to degree studies at Tampere University and the in the University Pathway Finland separate admission.</p> <p>Aalto University transfers the final records of the completed courses with grades to the University of Oulu regarding those Pathway students who apply to degree studies at the University of Oulu in the University Pathway Finland separate admission.</p> <p>Tampere University and the University of Oulu transfer the data of the completed courses with grades to Aalto University, originating from the teaching arranged by their universities.</p> <p>Aalto University and Tampere University transfer to each other necessary participant data for carrying out the University specific tasks in the Pathway programme, such as providing counselling or support to the student or managing a complaint made by a student.</p> <p>Aalto University and the University of Oulu transfer to each other necessary participant data for carrying out the University specific tasks in the Pathway programme, such as providing counselling or support to the student or managing a complaint made by a student.</p> <p>The data of the Pathway students' study rights and completed courses is transferred to the Finnish national register for higher education achievement records (VIRTA).</p>
<p>9. Transfer of data outside the EU/EEA</p>	<p>The university's data protection policy is to exercise particular care when transferring personal data outside the EU and the EEA to countries that do not offer the data protection required by the European General Data Protection Regulation (GDPR). Transfers of personal data outside the EU and EEA are done in accordance with the requirements of the GDPR.</p>
<p>10. Data protection principles</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> usernames <input checked="" type="checkbox"/> password <input checked="" type="checkbox"/> multi-factor authentication (MFA) <input checked="" type="checkbox"/> access management (IP address) <input checked="" type="checkbox"/> collection of log data <input checked="" type="checkbox"/> physical access control <input type="checkbox"/> other, please specify
<p>11. Data retention period or criteria for determining the retention period</p>	<p>Main retention periods:</p> <p>Admission data to the Pathway programme</p> <ul style="list-style-type: none"> ▪ Rejected applications for a minimum of 2 years.

	<ul style="list-style-type: none"> ▪ Accepted applications for a minimum of 5 years. ▪ Entrance exams for a maximum of 2 years. ▪ Payment data in accordance with prevailing compulsory legislation. <p>Study data</p> <ul style="list-style-type: none"> ▪ Data of the course activities, including course attainments, feedback etc., in accordance with the retention periods of the particular University. ▪ Records of the completed courses for a minimum of 10 years. ▪ Certificates for a minimum of 50 years (Aalto University).
<p>12. Existence of automated decision-making or profiling, the logic involved as well as the significance and the envisaged consequences for data subjects</p>	<p>The data stored in the register will be used to carry out automated decision-making, including profiling:</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes, please specify:</p>
<p>13. Rights of data subjects</p>	<p>Data subjects have the following rights under the EU General Data Protection Regulation (GDPR). The rights concern both Aalto University, Tampere University and the University of Oulu. To make any information requests related to his or her rights as a data subject, the student may use a single contact point dpo@aalto.fi.</p> <p><u>Right of access</u></p> <ul style="list-style-type: none"> ▪ Data subjects are entitled to find out what information the University holds about them or to receive confirmation that the University does not process their personal data. <p><u>Right to rectification</u></p> <ul style="list-style-type: none"> ▪ Data subjects have the right to have any incorrect, inaccurate or incomplete personal details held by the University revised or supplemented without undue delay. In addition, data subjects are entitled to have any unnecessary personal data deleted. <p><u>Right to erasure</u></p> <ul style="list-style-type: none"> ▪ In exceptional circumstances, data subjects have the right to have their personal data erased from the Data Controller's records ('right to be forgotten'). <p><u>Right to restrict processing</u></p> <ul style="list-style-type: none"> ▪ In certain circumstances, data subjects have the right to request the University to restrict the processing of their personal data until the accuracy of their data (or the basis for processing their data) has been appropriately reviewed and potentially revised or supplemented.

	<p><u>Right to object</u></p> <ul style="list-style-type: none">▪ In certain circumstances, data subjects may at any time object to the processing of their personal data for compelling personal reasons. <p><u>Right to data portability</u></p> <ul style="list-style-type: none">▪ Data subjects have the right to obtain a copy of the personal data that they have submitted to the University in a commonly used, machine-readable format and transfer the data to another Data Controller. <p><u>Right to lodge a complaint with a supervisory authority</u></p> <ul style="list-style-type: none">▪ Data subjects have the right to lodge a complaint with a supervisory authority in their permanent place of residence or place of work if they consider the processing of their personal data to violate the provisions of the GDPR (EU 2016/679). In addition, data subjects may follow other administrative procedures to appeal against a decision made by a supervisory authority or seek a judicial remedy. <p>The Data Controller follows a GDPR-compliant procedure for responding to subject access requests.</p>
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