

## **Privacy Notice**

This privacy notice explains how Aalto University processes your personal data after you have responded to the AllWell? student survey.

### **1. Why and on what basis does Aalto University process your personal data?**

The purpose of the Aalto University's AllWell? student 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. The responses serve as a basis for personal feedback to the respondents and provide the Aalto University schools, programmes and majors with information on their students' experiences. Any background information will not be used in formulating the feedback.

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 tutkintorekistereistä, 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)

### **2. What personal data does Aalto University process?**

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

**Questionnaire form:**

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

Student responses to the following measures:

Study skills: prior knowledge, motivation, self-efficacy, test anxiety, self-criticism, organised studying, study technique, problems with learning. Personal resources: life situation and conditions, identity, career certainty, certainty over the direction of your life, concentration, executive function, social relationships, wellbeing. Teaching and supervision; assessment and feedback, student commitment and involvement, interest in teaching, constructive alignment of teaching and degree programme, programme workload, student-oriented guidance. Study environment: the digital, physical, and cultural study environment, safe atmosphere, peer support. Study wellbeing and workload: study burnout, experience of study wellbeing. Use of time; use of time for studying and paid work.

In addition, there is a set of optional, open-ended survey questions, the responses to which are submitted in their original form to those who develop teaching and services within Aalto University, its schools, programmes and – at the discretion of the schools – student associations.

Information that may contain special categories of personal data (sensitive data):

- Risk of study burnout: stress and reduced study motivation; emotions: self-criticism, and questions concerning personal resources as well as the optional feedback given in the open-ended questions.

### **Background information from Aalto University's student information register:**

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.

### **3. Disclosure of personal data for research purposes**

Student responses to the AllWell? survey and data in the student information register combined with it, as well as other teaching and learning feedback given by Aalto students and information related to course completions may be disclosed for research purposes in compliance with the General Data Protection Regulation (EU 2016/679) and the Finnish data protection legislation. In the survey, the student is asked to give their consent for their data being disclosed for

scientific research purposes. Individual persons cannot be identified from any research publications where the above data are used.

#### **4. Processor of personal data**

The survey is conducted in the Webropol system, for additional information, see [Privacy policy | Webropol](#)  
Aalto has an agreement on the processing of personal data in the Webropol system.

#### **5. Transferring your data to third countries**

Not transferred.

#### **6. How does Aalto University protect personal data?**

Information security is important to Aalto. Aalto University utilizes appropriate technical, organizational and administrative safety precautions to protect personal data against disappearance, misuse, unlawful use, transferral, change or destruction.

At Aalto University, only the persons responsible for the contents and technical implementation of the survey are allowed to process the students' survey responses containing identifiable information. These persons are not associated with the Aalto University schools or degree programmes. Student responses to the AllWell? survey are combined with data in the student information register and may also be combined with other teaching and learning feedback given by Aalto students as well as with information related to course completions.

The Aalto University schools, degree programmes and Learning Services staff get summaries of the responses of students as PowerBI reports, from which individual respondents are not identifiable. The PowerBI report will show the responses for a given degree programme or major only if the number of potential respondents is five or more.

Only persons responsible for the contents and the technical implementation of the survey are allowed to process the student feedback given in the open-ended survey questions when it is connected with direct identifiers, such as the respondent's name. Student responses to the open-ended survey questions are sent in their original form to the schools, degree programmes and majors, but the responses will not be connected to direct identifiers, such as the names of the students. The responses are processed in the language they have been originally written without being anonymised. It is possible that a student is identifiable from their responses to the open-ended questions.

#### **7. How long is your personal data retained?**

Your personal details will be stored for four (4) years for the purpose of analysing and comparing the results. If your survey responses are used for research purposes, they will be stored until five (5) years have passed since the publication of the latest scientific research where they were used.

## **8. Updates to this privacy policy**

This privacy notice may be updated as regards Aalto University education and research. The latest version is available on this page: <https://www.aalto.fi/en/services/the-allwell-student-survey>

## **9. Your rights**

You have rights related to the processing of your personal data by Aalto. The extent of your rights is tied to the legal basis for processing your data and applicable legislation.

### **a) The right to access data**

You have the right to access personal data related to you that is being processed by Aalto.

### **b) The right to rectification**

You have the right to rectify erroneous or incomplete data.

### **c) The right to be forgotten**

You have the right to request the removal of your personal data in the following situations:

- You revoke your consent to process your personal data and there is no other legal basis for processing
- You resist the use of your personal data in direct marketing

Aalto University will, in many cases, be required to retain your personal data to comply with legal and other obligations.

### **d) The right to restrict processing**

If you dispute the correctness of the data we have collected or the legality of our processing, or if you have restricted the processing of the data in accordance with your rights, you may ask us to restrict the processing of your personal data to storage only. In these cases, the processing of your personal data will be restricted to storage until the correctness of the data can be verified or we have ascertained whether our legitimate interests supercede your right to to restrict our processing activity. If you do not have the right to request the removal of your

personal data from our registers, you may instead request the restriction of data processing to storage only.

#### **e) The right to object to data processing when processing is based on legitimate interests**

You always have the right to object to the use of your data in direct marketing.

#### **f) The right to data portability**

You have the right to receive your personal data in a machine-readable format. This right concerns personal data that has been processed only in an automated manner based on consent or contractual bases.

If you wish to use the rights listed above, your request to do so will be judged on an individual basis. Please note that we may retain and process your personal data if it is required to fulfill our legal obligations, to solve disputes or to fulfill contractual obligations.

### **10. How do you use your rights?**

The controller is Aalto University. In the above description we aim to give a clear view on our data processing activities. If you have questions regarding the processing of your personal data, we have not succeeded in our aim. In these cases, please contact us:

Requests under the GDPR concerning the processing of personal data can be submitted through our personal data portal: Aalto university personal data portal (<https://datarequest.aalto.fi/en-US/>)

Please note, that regular service addresses [allwell@aalto.fi](mailto:allwell@aalto.fi) for different services will still be used primarily for contact information changes and other routine changes.

The data subject may also contact the data protection officer of Aalto University if they 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 believe your data has been processed in breach of applicable data protection legislation, you have the right to lodge a complaint with the supervisory authority, the Data Protection Ombudsman (read more: [www.tietosuoja.fi](http://www.tietosuoja.fi)).

### **Other privacy notices**

**Aalto University**  
**Updated 31.1.2024**  
**Public**

Privacy notice for students: <https://www.aalto.fi/en/student-guide/privacy-notice>