

**PRIVACY NOTICE
COMMUNICATIONS AND MARKETING**
EU's General Data Protection Regulation (2016/679),
articles 13 and 14
Date: 17 February 2020
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1. Data controller

LAB University of Applied Sciences
Business ID: 2630644-6

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Lappeenranta campus
Yliopistonkatu 36, FI-53850 Lappeenranta
Phone: +358 29 446 5000 (exchange)

2. Data controller's representative and contacts

Data controller's representative:
Name: President Turo Kilpeläinen
Address: LAB University of Applied Sciences, Mukkulankatu 19, FI-15210 Lahti
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Brand and Communications Director Liisa Kuvaja
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Communications Manager Terhi Kuisma
Phone: +358 44 708 0398
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3. Data protection officer

Name: Legal Counsel Anne Himanka
Address: LUT University, Yliopistonkatu 34, FI-53850 Lappeenranta
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E-mail: tietosuoja@lab.fi

4. Purpose of data processing

The purpose of the communications data file is to communicate about the research, activity and events of the LAB University of Applied Sciences to fulfil the institution's societal interaction mission. The communications data file consists of representatives of media, municipal decision-makers and other key stakeholders.

The purpose of the marketing data file is to communicate about the education of the university of applied sciences and market its degree programmes. The marketing data file consists of potential applicants to the data controller's study programmes.

5. Legal basis of data processing

The processing of personal data is based on the data subject's consent (e.g. newsletter subscription, request to join a mailing list) or a legitimate interest of the data controller (adding key stakeholder representatives to a mailing list, tracking the number of visitors on the institution's web site, developing the web site).

6. Content of data file and storage periods

The person's name, e-mail, IP address, and in the communications data file, the data subject's employer or other organisation and phone number. For the applicant marketing newsletter, data is stored for one year, and other data is stored for as long as necessary for the data controller's activities.

7. Information systems used

The information systems employed in the processing of the marketing and communication data file are Campaign Monitor (newsletter tool), Epressi (press release circulation), Google Sheets, Zapier, Optinmonster, Adform, E-lomake, Lyyti, Landbot and Facebook Pixel.

In addition, Google Analytics and Google Tag Manager are used in website visitor tracking to analyse the use of pages and their parts. Data collected with these tools will not be linked to personal data or other cookie data.

8. Data sources

As a rule, data is collected from the data subjects themselves (newsletter subscriptions, requests to join mailing lists). Data is also gathered from public-access sources, such as websites of media outlets and stakeholder organisations, and databases of the Finnish National Agency for Education.

9. Use of cookies

Browser-based data filing systems employ cookies to process personal data. A cookie is a small text file that the browser saves on the user's device. Cookies are used to implement services, facilitate login, and enable the compilation of statistics on services. Users may prevent the use of cookies in their browser programmes, but this may prevent the system from operating correctly.

In this case, browser-based systems employ cookies to process personal data.

10. Data transfer and disclosure

Data will not be disclosed beyond the organisation. As a rule, external data processors will not be used in the processing of personal data. An exception is the above-mentioned electronic newsletter service Campaign Monitor, which is also used to send student marketing letters. The supplier of the newsletter service is committed to observing the EU's data protection legislation.

11. Data transfer and disclosure beyond the EU or EEA

As a rule, personal data will not be transferred beyond the EU or EEA with the exception of e-mail addresses on the server of the newsletter service provider used in LAB's applicant marketing.

12. Safeguards for data processing

User rights are granted only to employees whose job description requires access to the personal data file (e.g. e-mail recipient lists, rights to the newsletter tool). The data is protected by observing the data protection regulations of the university of applied sciences. No printouts or other documents that require physical protection exist of the data.

Employees of the university of applied sciences are bound by a secrecy obligation under the Act on the Openness of Government Activities, section 23. In addition, employees may not use their employer's professional or business secrets to their personal advantage or disclose these secrets to others (Employment Contracts Act, chapter 3, section 4). Storage periods, archiving and disposal have been provided for in an archiving plan.

13. Automated decision-making

No automated decision-making takes place in the data processing.

14. Rights of the data subject

Data subjects have the right to withdraw their consent if the data processing is based on consent.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if the subjects consider that the data processing regarding them is in breach of data processing legislation in force.

Data subjects have the following rights under the EU's General Data Protection Regulation:

- a) Right of access to data concerning the data subject (article 15)
- b) Right to rectification of data (article 16)
- c) Right to erasure of data (article 17). The right to erasure shall not apply if the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure prevents or significantly hinders the data processing
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20).

Data subjects' rights under the EU's General Data Protection Regulation do not automatically apply to all data processing.

The liaison in matters related to the data subject's rights is the data protection officer; contact details in section 3.