

**PRIVACY NOTICE
CONTINUING EDUCATION
EU's General Data Protection Regulation (2016/679),
articles 13 and 14
Date: 17 March 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
Phone: +358 44 708 5085

E-mail: turo.kilpelainen@lab.fi

Data controller's contact:
Name: Account Manager Sari Valkeapää
Phone: +358 40 535 1935
E-mail: sari.valkeapaa@lut.fi

3. Data protection officer

Name: Legal Counsel Anne Himanka
Address: LUT University, Yliopistonkatu 34, FI-53850 Lappeenranta
Phone: +358 50 564 4623
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4. Purpose of data processing

The arrangement of continuing education offered by the LAB University of Applied Sciences, documenting participants in continuing education, and marketing continuing education.

The continuing education data file contains the participants of the continuing education.

The collaboration network data file contains investors, owners of education facilities, and media house contacts.

The direct marketing data file contains important target groups of continuing education (e.g. specialists, directors, HR and training staff in companies).

5. Legal basis of data processing

The processing of data on continuing education participants is based on an agreement.

The processing of data in the student data file is based on a legal obligation: the Act on the National Registers of Education Records, Qualifications and Degrees.

The processing data related to collaboration networks that enables the arrangement of continuing education is based on the pursuit of the data controller's legitimate interest. Collaboration networks refer to e.g. investors, owners of education facilities, and media houses.

The data processing of the continuing education direct marketing data file is based on the data controller's legitimate interest or the data subject's consent. The direct marketing data file includes contact information of corporate HR employees, specialists and supervisors to whom continuing education could be marketed. Participants in continuing education may choose to give their contact information to the direct marketing data file in connection with registration or student feedback.

6. Content of data file and storage period

The following data on continuing education participants is stored: name, employer, birth date/personal identity code, gender, language, nationality, phone number, e-mail, street address, city, education, student ID number, job, department, marketing consent or its withdrawal, and participation in training.

The following data on continuing education collaboration networks is stored: name, employer, phone number, e-mail, street address, city, job, department, organisational level, and marketing consent.

The direct marketing data file contains the following data: name, employer, phone number, street address, city, job, department, marketing consent, and training interests.

Data on completed courses is stored permanently.

Other data is stored for as long as necessary for the purposes of continuing education. Data in the data files is reviewed frequently, and data will be removed when it is obsolete or when a data subject requests its removal and removal is legally possible.

7. Information systems employed

Registration system, student administration system and IT user management system of the LAB University of Applied Sciences. Financial management system of the LAB University of Applied Sciences for invoicing.

8. Data sources

Continuing education students of the LAB University of Applied Sciences provide their own personal data through a registration system. In courses commissioned by an employer, the employer provides the participant data collectively.

Data for direct marketing is collected from public-access web sites of companies and from participants in training in connection with registration and feedback.

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.

This system employs cookies to process personal data.

10. Data transfer and disclosure

Data is transferred within the university of applied sciences to provide services such as creating user accounts.

The university of applied sciences is legally obligated to disclose information:

- for collective storage and use in the national VIRTATA database of higher education institutions;
- to the Ministry of Education through the VIRTATA database for the assessment, development, statistics and other monitoring and steering of the education and research of the university of applied sciences;
- to Statistics Finland;
- for scientific research. Parties requesting data must explain the purpose for which the data will be used and provide other necessary information to determine whether the university of applied sciences can disclose the data and how the party will protect the data.

In addition, data may be disclosed to other authorities. The university of applied sciences applies good data processing practices and does not use external data processors in the processing of personal data.

11. Data transfer and disclosure beyond the EU or EEA

Personal data is not disclosed beyond the EU or EEA.

12. Safeguards for data processing

Data processing will not compromise students' privacy. Only those whose professional duties so require may process personal data. The data can only be accessed with a username to the system. Usernames are personal, and their user rights have been defined based on job duties. Software used in the processing has been protected in accordance with the information security practices of the university of applied sciences.

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.