

DATA PROTECTION NOTIFICATION ALUMNI RELATIONS

EU's General Data Protection Regulation
(2016/679), Articles 13 ja 14
Date: 21.10.2020
Updated: 5.3.2024

1. Data controller

LAB University of Applied Sciences (LAB)
Business ID: 2630644-6

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2. Data controller's representative and contacts

Data controller's representative:
President Turo Kilpeläinen
Address: Mukkulankatu 19, FI-15210 Lahti, Finland
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Email: turo.kilpelainen@lab.fi

Data controller's contact:
Vice President Merja Heino
Address: Yliopistonkatu 36, FI-53850 Lappeenranta, Finland
Phone: +358 40 760 5533
Email: merja.heino@lab.fi

3. Data protection officer

Legal Counsel Ilona Saarenpää
Address: LUT University, Yliopistonkatu 36, FI-53850 Lappeenranta
Phone +358 50 430 1072
Email: dataprotection@lab.fi

4. Purpose of personal data processing

Maintenance of alumni activities at LAB University of Applied Sciences

5. Legal basis of personal data processing

Data subject's consent and the legitimate interest.

The legal basis for processing personal data is the data subject's consent. However, personal data used in the candidate nomination process for the alumni award, obtained from sources

other than the data subject themselves, will be processed based on the legitimate interests of the data controller. The legitimate interest is the maintenance of the alumni network and the promotion of its visibility.

6. Content of data filing system and storage period

The filing system will store the basis of joining the alumni register, the data subject's name, e-mail address, phone number, home address, student number, admission date, graduation date, degree, study programme, degree studies and service language. In addition, the data subject may voluntarily give information on his/her home municipality, employer, job title and own personal interests.

The aforementioned personal data is stored retained permanently to maintain alumni activities unless a data subject requests the erasure of his/her data.

During the annual nomination process for the alumni award, only essential information necessary for the nomination is collected from voluntary respondents. From the nominator, the name and email address are collected, and optionally, the phone number, and, in accordance with legitimate interests, the nominee's name and the basis for the nomination. Additionally, the nominee's phone number, email address, job title, or organizational and educational field information can be voluntary provided by nominator.

The information collected during the alumni award nomination process is retained only temporarily, and the data is destroyed annually after the selection.

7. Information systems employed

LAB University of Applied Sciences employs customer management software in the processing of personal data.

Additionally, in alumni activities, an external provider's newsletter system, survey form application, and event tool are used.

8. Data sources

The information is collected based on the permission of the data subject either from the information systems for education and staff of LAB University of Applied Sciences or from the data subject him/herself.

The source of personal information collected for the nomination of the alumni award is the individual who proposes the award recipient through the survey form application.

9. Use of cookies

Browser-based filing information 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 appropriately.

Cookies are used in the processing of personal data in alumni activities.

10. Data transfer and disclosure

No personal data is disclosed to parties beyond the organisation.

As a rule, the processing of personal data is not outsourced to external data controllers. As an exception to the above, LAB employs an electronic newsletterservice through which also alumni newsletters are sent. The supplier of the electronic newsletter service processes e-mail addresses in alumni data filing system.

External data controllers are used in the processing of personal data. The data processing terms have been agreed with external data controllers with appropriate agreements. The supplier of the newsletter service has agreed to comply with the EU data protection legislation.

In the alumni award nomination process, a survey tool is used, and the provider of the tool acts as the data processor for personal information.

11. Data transfer and disclosure beyond the EU or EEA

As a rule, personal data is not transferred beyond the EU or EEA with the exception of e-mail addresses on the server of the newsletter service provider employed for LAB alumni activities.

12. Safeguards for data processing

Personal data is processed only by the personnel of LAB who are responsible for alumni activities. The customer management software, which is used to maintain the alumni data file, may only be accessed by a limited number of LAB staff members.

The customer data system is located on LAB's own server. Contractual terms and conditions ensure that the external newsletter service provider and the supplier of the survey processes personal data in a secure manner.

The university's information security rules and guidelines apply to the management of information systems that process personal data. The information systems and their user interfaces are technically protected e.g. with a firewall, encryptions and data backups. Personal data is protected from unauthorised use. Only service administrators or others with specific prior authorisation may access the personal data. Usernames are personal, and user rights to information systems are limited through user group definitions: users may only access data that they need for their professional duties for the duration of their employment relationship. Printed documents are stored and safeguarded from external access.

University employees are bound by secrecy obligations under the Act on the Openness of Government Activities, section 23. In addition, university employees may not use the employer's professional and business secrets to their own advantage or disclose them to others (Employment Contracts Act, chapter 2, section 4). The employment contract has a nondisclosure clause. Secret information and its storage periods, archiving and disposal are defined in the university's filing 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)
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20).

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