

**PRIVACY NOTICE  
LUT CADEMIC LIBRARY  
EU's General Data Protection Regulation  
(2016/679),  
Articles 13 and 14  
Date: 1 June 2020  
Updated 3 September 2024**

### **1. Data controller**

LAB University of Applied Sciences  
Business ID: 2630644-6

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Niemenkatu 73, 15140 Lahti, Finland  
Phone +358 3 828 18 (switchboard)

Lappeenranta campus:  
Yliopistonkatu 36, 53850 Lappeenranta, Finland  
Phone +358 3 828 5000 (switchboard)

### **2. Data controller's representative and contacts**

Data controller's representative:  
Name: President Turo Kilpeläinen  
Phone: +358 44 708 5085  
Email: turo.kilpelainen@lab.fi

Data controller's contact:  
Name: Chief Librarian Miia Willman  
Phone: +358 44 708 1828  
Email: miia.willman@lut.fi

### **3. Data protection officer**

Name: Ilona Saarenpää, Legal Counsel  
Phone: 0294 462 111 (switchboard)  
Email: tietosuoja@lut.fi

#### 4. Purpose of personal data processing

Personal data is collected and processed to develop the operations and services of the LUT Academic Library, maintain its customer relationships and publication activity, and prevent any abuse of the library's services.

If the customer creates a personal profile in an e-material or reference database, the personal data (e.g., name and email) in the profile will be transferred to the database and service provider in question.

#### 5. Legal basis of personal data processing

Personal data is processed based on a customer relationship agreement, the use of the library's website, the creation of a personal user account in certain electronic materials and reference databases, publishing activity, or the express consent of customers.

Moreover, in some systems, the processing is based on the data controller's legitimate interests or legal obligations.

#### 6. Information systems employed

*The library device management system and loaning and returning system of printed material*

- Names, addresses, email addresses and phone numbers are saved in the service log file.
- Self-checkout machines do not store customers' personal data.

*Library Management System and User Interface*

- Customers' personal data is stored in the library management system, to which only employees of the LUT Academic Library have user rights to the extent required by their duties. Contacts with customers are maintained by phone, email and chat. Customer data in the library management system: name, address, email address, phone number, birth date, organisational credentials, main organisational role, library card number. In addition, the personal customer interface account contains favourites, loans, reservations, and fees.
- The library management system stores data for the duration of studies or employment relationships at LUT Universities, and data of external customers is stored for no more than three years from the latest customer event. A customer's loaning history is stored in the customer's data for no longer than the duration of the customer relationship. When a customer's organisational credentials expire, the customer can no longer use them to access the customer interface. External customers can log into the customer interface for the duration of the customer relationship.

*Data management plan tool*

- Compulsory customer information for the data management plan include name, email address, organisation, and username. In addition, the ORCID ID, phone, affiliation, and project role may be collected.
- The information is stored for as long as the system is in use or until the person asks for the removal of the information.

*Publishing systems and platform*

- Publishing systems process personal data when interacting with customers, in publication agreements, and in the production of publication metadata. Author data is stored for as long as the publication in question is stored. Author data is saved in the institutional repository, research portal, and organisational units' cloud storage.

- For publications, names are visible for as long as the publication and its metadata are public.

#### *Mobile application*

- For the mobile application, the user's ID, email address, organisational information and registration date are processed.
- The data is stored for as long as the service is in use or the customer asks the supplier to remove the data.

#### *Library chat service*

- The library's chat service collects the customer's name, email address, phone number, IP address, the number of times logged on from the IP address, and data on the device, operating system, and platform.
- The data is stored for as long as the service is in use or the customer asks the supplier to remove the data.

#### *Proxy server*

- The proxy server collects the user's IP address, timestamp and technical data from the session.
- Log data is stored for a week.

#### *Other systems*

Service forms are used to collect data for purposes mentioned on the forms, and the data is stored for the period required for its processing – a maximum of five years. Depending on the form and service, the data collected may include the customer's name, address, email, phone number, customer segment, major subject / degree programme, and date of birth.

A personal identity code is collected from external customers in a password protected Excel file on the organization's network drive, which is accessed only by the library's customer service staff. This data is stored for no more than three years from the latest customer event.

Customers can create their own profiles or user accounts in e-material and reference databases. In such cases, the profile data is transferred to those databases. Data in customer profiles and user accounts of e-material and reference databases is stored in accordance with the policies of the databases and their providers. LAB is a data controller in certain electronic services.

## **7. Data sources**

Data is mainly collected from the users themselves. The exceptions are the following:

- Library management system: The personal data of customers from surrounding organisational units is transferred to the library management system from the identity management system. External customers save their personal data on a service form from which the data is transferred to the library management system. Other data sources may include student data files and public address and phone number services, if needed.
- The library device management system and the loaning and returning system of printed material: Data is collected from the library management system based on library card numbers.
- Mobile application: Data is gathered from the identity management system and library management system.
- Proxy server: Data is gathered from the identity management system.
- Publishing systems and platform: Data is collected from the users themselves or from publications.

For e-material and reference databases, customers create their own credentials or profiles and approve the processing conditions. In some e-material services, data may be transferred from the identity management system.

## **8. Use of cookies**

Browser-based filing information systems and websites 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 ensure the functionality of the site, to provide and develop services, to target marketing, and to enable the collection of statistics on service use. Users can prevent the use of cookies on their browser, but that may influence the functionality of the online service.

## **9. Data transfer and disclosure**

Access to data may be granted for the compilation of statistics (not including personal data).

As a rule, access to personal data and addresses is not granted for external use. If necessary, we disclose data to Certia (invoicing), a payment transfer service (card payments), and LAB's Finance Services. The metadata and author data of publications are transferred to national and international databases, and data on authors can be freely mined.

## **10. Data transfer and disclosure beyond the EU or EEA**

As a rule, data is not transferred beyond the EU or EEA.

Exceptions may include the university's chat service and certain e-material databases. Conditions have been set in agreements with each service provider. Further information on data transfer beyond the EU or EEA is available in the privacy notices or websites of each service provider.

In addition, resource databases can transfer data beyond the EU and EEA with the consent of the user.

## **11. Safeguards for data processing**

Customer data may only be accessed by the staff at the LUT Academic Library to the extent required in the performance of their duties. Access to the library management system requires a personal username and password. The staff processes data securely and with care.

Manual material is stored in locked facilities at the LUT Academic Library.

If necessary, customer forms may be stored in a shared email inbox that can only be accessed by employees who need the data to perform their duties.

Agreements have been concluded to ensure that the information systems employed by the library are safeguarded to the extent required by data protection legislation.

## **12. Automated decision-making**

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

## **13. 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 they 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.*