

## Privacy policy for data subjects

This policy contains the information mandated by the EU's General Data Protection Regulation (articles 13 and 14).

<b>Name of register:</b>	Graduand feedback questionnaire - <b>AVOP</b> and Universities' national student feedback survey - <b>Kandipalaute</b>
<b>Date:</b>	11 March 2019
<b>Controller, contact person and responsible person for the register</b>	<p><b>AVOP</b> The Rectors' Conference of Finnish Universities of Applied Sciences – Arene Petri Lempinen <a href="mailto:info@arene.fi">info@arene.fi</a></p> <p><b>Kandipalaute</b> All university-specific information can be read here (available in Finnish): <a href="https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojaillmoitusta+varten">https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojaillmoitusta+varten</a></p>
<b>Data protection officer and contact information</b>	<p><b>AVOP</b> The Rectors' Conference of Finnish Universities of Applied Sciences – Arene Petri Lempinen <a href="mailto:info@arene.fi">info@arene.fi</a></p> <p><b>Kandipalaute</b> All university-specific information can be read here (available in Finnish): <a href="https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojaillmoitusta+varten">https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojaillmoitusta+varten</a></p>
<b>Purpose for maintaining the register and legal basis for processing personal data</b>	<p><b>AVOP</b> - Graduand feedback questionnaire asks graduating students to evaluate and provide feedback on their education. The findings are used locally by institutions to improve their institutional processes and practices and nationally to inform performance-based monitoring and funding.</p> <p><b>Kandipalaute</b> is the universities' national student feedback survey that is used to assess how satisfied students who have completed their bachelor's degree are with their respective universities as well as their experiences on the progression of their studies. The survey is based on scientific research that focuses on learning, studying and teaching as well as the HowULearn survey, which was developed on the basis of this research at the University of Helsinki. The results of the survey are used in the development of the education provided by the universities and in national university guidance activities.</p> <p>Survey (AVOP or Kandipalaute) is sent to all graduating degree students from universities of applied sciences and all university students who have</p>

	<p>completed a bachelor's degree. Their responses are collected using the Arvo Education Management Information Service.</p> <p>The VIRT A Higher Education Achievement Register is used to collect the data that is needed to confirm the student's right to respond, guide students towards the correct survey, identify respondents who have already answered the survey and link the data of respondents who have given their consent to the data in the student register.</p> <p>The higher education institution processes the data of respondents who have given their consent to the linking of the data to develop its teaching and educational activities and in quality assurance.</p> <p>The data of all respondents is used for statistical purposes.</p> <p>All respondent data is reported in a manner that no individual persons can be identified.</p> <p>The higher education institution's right to process personal data as a controller is based on</p> <ul style="list-style-type: none"> <li>the performance of a task carried out in the public interest or in the exercise of official authority (article 6.1 e)</li> <li>the compliance with a legal obligation (General Data Protection Regulation article 6.1 c)</li> <li>and, in certain cases, an agreement or consent (article 6.1 a and b)</li> </ul> <p>Primary statutes</p> <ul style="list-style-type: none"> <li>The Universities of Applied Science Act 932/2014 and the decrees issued on the basis of it</li> <li>The Government Decree on Universities of Applied Science 1129/2014 including amendments</li> <li>The Universities Act 558/2009 and the decrees issued on the basis of it</li> <li>The Government Decree on University Degrees 794/2004 including amendments</li> <li>The Act on National Study and Degree Registers 884/2017 (chapter 5)</li> <li>The General Data Protection Regulation (EU) 2016/679 and the Data Protection Act 1050/2018</li> <li>The Act on the Openness of Government Activities 621/1999</li> </ul>
<b>A: Personal data is being collected directly from you</b>	Yes
<b>B: Personal data is being collected from other sources than you</b>	<p>Yes:</p> <ul style="list-style-type: none"> <li>From your HAKA login</li> <li>From the VIRT A Higher Education Achievement Register (data pertaining to the higher education institution's student register)</li> <li>The higher education institution's student register (only in some universities, for more information please visit <a href="https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojailmoitusta+varten">https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojailmoitusta+varten</a>)</li> </ul>

<p><b>The register's data content (description of data subject groups and personal data groups)</b></p>	<p>Data collected from your HAKA login:</p> <p>Personal identification number</p> <ul style="list-style-type: none"> <li>• purpose: the retrieval of background data from Virta</li> <li>• not stored in the Arvo service</li> </ul> <p>Student number</p> <ul style="list-style-type: none"> <li>• purpose: the retrieval of background data from Virta</li> <li>• not stored in the Arvo service</li> </ul> <p>Organisation</p> <p>Data collected from the VIRTA Higher Education Achievement Register:</p> <p>Education provider</p> <p>Educational institution</p> <p>Place of business</p> <p>Degree</p> <p>Municipality</p> <p>The language that the degree was completed in</p> <p>Study right key (data is stored separately from other feedback data)</p> <p>Degree start date (data is stored separately from other feedback data)</p> <p>Data collected in the feedback survey:</p> <p>Age</p> <p>Gender</p> <p>Previous education</p> <p>Answers given in the national feedback survey</p> <p>Answers given for higher education institution-specific questions</p> <p>Data collected from the higher education institution's student register:</p> <p>Data collection methods vary between the higher education institutions. However, every higher education institution reports the data in a manner that no individual persons can be identified.</p> <p>Inquiries: <a href="https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tieto-suojailmoitusta+varten">https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tieto-suojailmoitusta+varten</a></p>
<p><b>Recipient and recipient groups of the personal data (= disclosures)</b></p>	<p>CSC, as the personal data processor of the Arvo system, for the following processing measures: study right key management, the collection and storage of personal data on the server, the management of problems, the reporting of statistical data on the national Vipunen statistics service and the delivery of the material to the Finnish Social Science Data Archive.</p> <p>Individual higher education institutions, for the purposes of preparing reports, statistics and analyses on the respondents' feedback data on its bachelor's degree (employees whose work duties include the production of analyses and the technical maintenance of the data warehouse) either via a technical interface or a CSV file uploaded by the responsible user of the Arvo system.</p> <p>The research data is disclosed in pseudonymised form to the Finnish Social Science Data Archive for permanent archival and research purposes by those higher education institutions that have signed an agreement on the disclosure.</p> <p>Inquiries: <a href="https://www.fsd.uta.fi">https://www.fsd.uta.fi</a></p> <p>The disclosure of personal data for scientific data only in situations permitted by law.</p>

<b>Transfer of data to third countries</b>	<p>No personal data is disclosed or otherwise routinely transferred outside the EU and EEA. The higher education institution's and Arene's data protection policy is to pay special attention to any situation where personal data is to be transferred outside the EU and EEA to any country that does not provide the level of data protection mandated by the EU's General Data Protection Regulation. The transfer of personal data outside the EU and EEA will be conducted in accordance with the requirements presented in the General Data Protection Regulation.</p>
<b>Storage period / definition criteria for personal data</b>	<p>All personal data is stored for as long as necessary for the completion of analyses (at least 5 years). The storage of personal data is conducted in accordance with higher education institution specific storage periods.</p>
<b>The right of data subjects to access, correct or remove their data and to request for the restriction of the processing of their data or transfer their data from one system to another (General Data Protection articles 15, 16, 17, 18 and 20)</b>	<p><b>AVOP</b> All requests related to the rights of data subjects can be submitted to <a href="mailto:info@arene.fi">info@arene.fi</a></p> <p><b>Kandipalaute</b> All requests related to the rights of data subjects can be submitted to university-specific addresses. A list of these can be found here: <a href="https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojailmoitusta+varten">https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojailmoitusta+varten</a></p> <p><b>A student's access to their own data</b> A student has the right to know what personal data about them is being processed and what data has been stored about them.</p> <ul style="list-style-type: none"> <li>• The student may submit an information request to Arene (AVOP) and to the university (Kandipalaute). In such cases, the following procedure will take place:</li> <li>• Arene (AVOP) / The university (Kandipalaute) will submit the requested information as soon as possible without undue delay. The requester must provide separate proof of their identity if they are asked to do so. The deadline for the delivery of the data or additional information related to the information request is one month after the request was received. If the information request is complex and wide-ranging, the deadline may be extended by two months.</li> <li>• The information is generally provided free of charge. If the student requests for several copies, a fee based on administrative costs will be collected. If the information request is clearly without basis or unreasonable or the student submits information requests repeatedly, Arene (AVOP) / the university (Kandipalaute) may collect the administrative costs caused by the delivery of the information or entirely refuse to deliver the information. In such cases, Arene (AVOP) / the university (Kandipalaute) must justify the decision it has made.</li> <li>• If Arene (AVOP) / the university (Kandipalaute) does not deliver the information, a written statement on the matter will be provided to the student. In connection with this, the student will be informed of their right to legal remedies, for example their right to submit a complaint to the supervisory authority.</li> </ul>

	<p><b>A student's right to the correction of their data</b></p> <ul style="list-style-type: none"> <li>• A student has the right to demand that any erroneous, inaccurate or deficient personal data that applies to them be corrected or supplemented without undue delay. In addition, the student has the right to demand the removal of any unnecessary personal data that applies to them.</li> <li>• If Arene (AVOP) / the university (Kandipalaute) does not approve of the correction request, a written statement is provided on the matter specifying the reasons due to which the demand was not approved. In connection with this, Arene (AVOP) / the university (Kandipalaute) will inform the student of their right to legal remedies, for example their right to submit a complaint to the supervisory authority.</li> </ul> <p><b>A student's right to the removal of their data</b></p> <ul style="list-style-type: none"> <li>• Based on the legal basis for the processing of the data, a student may have the right to demand the removal of their personal data from the higher education institution's register. This right does not apply to such cases where the processing of personal data is necessary due to a legal obligation or the exercise of the official authority belonging to the higher education institution. The storage and removal of data is conducted in accordance with Arene's (AVOP) / the university's (Kandipalaute) data management plan and statutory data storage periods.</li> </ul> <p><b>The right to request for the restriction of processing</b></p> <ul style="list-style-type: none"> <li>• In certain situations, a student may have the right to ask for a restriction of the processing of their personal data until the legal basis for the data or its processing has been appropriately checked and corrected or supplemented.</li> </ul> <p><b>The right to transfer personal data from one system to the next to another controller</b></p> <ul style="list-style-type: none"> <li>• The transfer of personal data from one system to the next means that the data subject receives the personal data that they have provided in a structured, common and machine-readable format and that they can transfer the data in question to another controller without being prevented from doing so by Arene (AVOP) / the university (Kandipalaute). This right only applies to situations where the processing of the data is automatic and based on consent or an agreement.</li> <li>• The right does not apply to for example the processing of such personal data that is necessary for the completion of a task related to the public interest or the fulfilment of a legal obligation belonging to the controller. This means that this right is not primarily applicable to the personal data registers of Arene (AVOP) / the university (Kandipalaute).</li> </ul>
<p><b>A data subject's right to object to data processing</b></p>	<p>Based on a personal and special situation, a student has the right to object to the processing of their personal data at any time when the legal basis for the processing is the completion of a task concerning the public interest, the execution of public authority or Arene's (AVOP) / the university's (Kandipalaute) privileged right. In such cases, the data may only be processed further</p>

	<p>if an especially and justified reason can be presented for the processing of the data.</p> <p>The student has the right to object to the processing of their personal data for direct marketing purposes for no special reason and at any time.</p>
<b>A data subject's right to revoke their consent</b>	<p>In situations where the processing of a student's personal data is based solely on consent, the student may revoke their consent. The revocation of the consent does not affect the legality of the processing that occurred on the basis of the consent provided before the revocation.</p> <p><b>AVOP</b> The revocation of a data subject's consent is submitted to <a href="mailto:info@arene.fi">info@arene.fi</a></p> <p><b>Kandipalaute</b> The revocation of a data subject's consent is submitted to university-specific addresses, a list of which can be found here: <a href="https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojaillmoitusta+varten">https://wiki.eduuni.fi/display/CscKandipalaute/Kooste+tietosuojaillmoitusta+varten</a></p>
<b>The right of a data subject to submit a complaint to the supervisory authority</b>	<p>A student may submit a complaint to the supervisory authority if they feel that the processing of their personal data violates the EU's General Data Protection Regulation (EU) 2016/679. In addition, the student also has the right to exercise other administrative appeal methods and legal remedies. For more information, see <a href="https://tietosuoja.fi/en">https://tietosuoja.fi/en</a></p> <p>The student also has the right to bring an action against the controller or organisation processing the personal data if they feel that their rights have been violated due to the fact that the processing of the personal data has not been done in accordance with the General Data Protection Regulation.</p>
<b>The processing of personal data for automated decision-making, including profiling</b>	No