

# SAMK person registers

This document gathers information on central person registers regarding informing the registered. In addition, there are short-term registers, which have their own documents. These kinds of short-term registers arise in connection with various events and inquiries.

SAMK's www-pages publish all these registers.

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|  |   |   |
|--|---|---|
| <b>Title of register</b>   | <b>agenttisi.fi -service</b>  |   |
| Contact person   | Aleksi Postari  | aleksi.postari@samk.fi  |
| Cause for handling   | Consent by the registered   |   |
| Purpose of handling  | <ul style="list-style-type: none"> <li>▪ to apply for and choose a summer job or traineeship</li> <li>▪ to offer a job</li> <li>▪ for service development and statistical purposes</li> </ul>   |   |
| Groups of registered   | Applicants for summer jobs and traineeships, employer's representatives processing data of persons selected for jobs  |   |
| Information groups   | <b>Data groups for all registrants:</b>   | <b>Retention period</b>   |
|  | First names and surnames  | Data will be deleted if consent is withdrawn<br><br>The data can be checked, corrected, and deleted by the data subject |
|  | Contacts  |   |
|  | Information on consent  |   |
|  | <b>Applicant's data groups:</b>   |   |
|  | Date of birth   |   |
|  | Driving licence information   |   |
|  | Training information  |   |
|  | Language skills   |   |
|  | Photograph  |   |
|  | Video screenshot (presentation video)   |   |
|  | Answers to profiling questions (20 pcs)   |   |
|  | Skills description  |   |
|  | Information on work cards and passports   |   |
|  | Attachments provided by the data subject (CV)   |   |
|  | Areas of interest   |   |
|  | Details of the job applied for (job title, type of job, location)   |   |
| Consent to job search-related emails from partners                                 |   |   |
| Employment status (not working, got a job elsewhere, got a job through your agent) |   |   |
| <b>Company data groups:</b>  |   |   |
| Company information (name, website, logo)  |   |   |
| Details of the job on offer (job title, type of job, location)                     |   |   |
| Data sources   | From the person himself/herself   |   |
| Groups of recipients   | The data will not be passed on.   |   |
| Data transfer outside EU/ETA   | No transfer of data outside the EU or EEA   |   |
| Automatic decision-making  | There is no automatic decision-making.  |   |
| Profiling  | <p>Registrants are not profiled. In the service, the applicant creates a profile about him/herself and his/her skills. The information provided by the applicant is not used to predict, analyse or categorise the person, nor is it aggregated or further processed. It is the applicant who keeps his/her data up to date. The company creates a profile defining the skills required for the summer job/traineeship vacancy. Based on the profiles created by the applicants, the service offers the company candidates for interviews. The service does not perform any automatic decision-making or profiling. For more information, please contact the Office of the Data Protection Ombudsman: <a href="https://tietosuoja.fi/en/automated-decision-making-and-profiling">https://tietosuoja.fi/en/automated-decision-making-and-profiling</a></p> |   |
| On data processing   | Employers and their recruiters are identified before they are authorised to browse the information provided to the employer by proposed candidates. The applicant will only see a list of the names of the companies offering the job.  |   |

## Alumni register

Jani Wahlman

|                              |   |  |
|------------------------------|---|--|
| <b>Title of register</b>     | <b>Alumni register</b>  |  |
| Contact person               | Jani Wahlman<br>Head of Communications  | jani.wahlman@samk.fi<br>+358 44 710 3987                           |
| Cause for handling           | Consent by the registered   |  |
| Purpose of handling          | <ul style="list-style-type: none"> <li>• educational marketing</li> <li>• informing of events</li> <li>• sending a newsletter/alumni letter</li> <li>• recruitment for presentations or lectures</li> </ul> |  |
| Groups of registered         | Graduates from Satakunta University of Applied Sciences   |  |
| Information groups           | <b>Information group</b>  | <b>Storage time</b>  |
|                              | First and last name(s)  | 5 years  |
|                              | Contact information   | 5 years  |
|                              | Date of birth   | Data will be deleted if consent is withdrawn                       |
|                              | Training information  |  |
|                              | Information related to work and skills  |  |
|                              | Topics of your own competence or interest   |  |
|                              | Information on consent  | 5 years (to avoid reposting, the data will no longer be processed) |
| Information sources          | From the person himself/herself   |  |
| Groups of receivers          | Data will not be passed on  |  |
| Data transfer outside EU/ETA | No transfer of data outside the EU or EEA   |  |
| Automatic decision-making    | There is no automatic decision-making   |  |
| Profiling                    | No profiling of registered  |  |

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## Applicant register

Pia Lamminen

| Title of register            | Applicant register  |  |
|------------------------------|---|--|
| Contact person               | Pia Lamminen<br>Training Manager  | pia.lamminen@samk.fi<br>+358 44 710 3128 |
| Cause for handling           | Statutory obligations<br>Handling necessary to complete agreement   |  |
| Purpose of handling          | <ul style="list-style-type: none"> <li>• For statistics</li> <li>• For student selection</li> <li>• For administering study information</li> <li>• For managing invoicing</li> <li>• For generating user identifier</li> </ul>  |  |
| Groups of registered         | Applicants to education (non-degree education)  |  |
| Information groups           | <b>Information group</b>  | <b>Storage time</b>                      |
|                              | First and last name(s)  | 10 yrs                                   |
|                              | Social security number  | 10 yrs                                   |
|                              | Contact information   | 10 yrs                                   |
|                              | Nationality and mother tongue   | 10 yrs                                   |
|                              | Educational information   | 10 yrs                                   |
|                              | Work experience and work-related information, title   | 10 yrs                                   |
|                              | Grounds for application   | 10 yrs                                   |
| Information sources          | Person him-/herself   |  |
| Groups of receivers          | <p>Information is forwarded to the student management system, if needed, to register studies and create user identifiers.</p> <p>Virta Tietovaranto (bought service from CSC by Ministry of Education and Culture) and Finnish Statistics save information on education not leading to a degree.</p> <p>Information can be forwarded to joint organizers of educational events only as much as is necessary to carry out the event. The joint organizer destroys the information after the event has taken place.</p> |  |
| Data transfer outside EU/ETA | Data is not disclosed outside EU/ETA  |  |
| Automatic decision-making    | No automatic decision-making  |  |
| Profiling                    | No profiling of registered  |  |

# Camera surveillance register

Tero Hämäläinen

| Title of register                    | Camera surveillance register  |   |
|--------------------------------------|---|---|
| Contact person                       | Tero Hämäläinen<br>Head of Facility and Security Services   | tero.hamalainen@samk.fi   |
| Cause for handling                   | Privileged interest of register keeper  |   |
| Purpose of handling                  | Usage of a video surveillance system is necessary to manage and operate Satakunta University of Applied Sciences <ul style="list-style-type: none"> <li>• to secure personal safety of employees and/or other people at the premises</li> <li>• to protect property</li> <li>• to control appropriate operation of production processes</li> <li>• to prevent and examine situations endangering the above mentioned</li> </ul>   |   |
| Groups of registered                 | People at the SAMK campuses or in the immediate vicinity  |   |
| Information groups                   | <b>Information group</b>  | <b>Storage time</b>   |
|                                      | Visual recording  | <ul style="list-style-type: none"> <li>• ca 1 month</li> <li>• Storage time of material transferred to the authorities is according to their data protection principles.</li> </ul> |
| Information sources                  | Camera surveillance equipment   |   |
| Access to and release of information | Internal security personnel and outside guards<br><br>Only internal security personnel have access to the video recordings. In addition, live video material is accessible also to guards at work, also the outside security staff.<br><br>Data protection instructions<br><br>All new staff members, also the outside guards with access rights, get instructions on data protection. Every person handling the register, including the outside security staff, sign a promise of secrecy.   |   |
| Groups of receivers                  | Authorities, for investigations   |   |
| Principles of register protection    | To protect the video surveillance system and personal data, several technical and organizational procedures have been made.<br><br>The following actions have taken place a.o. <ul style="list-style-type: none"> <li>• The servers for saving the pictures are located in protected premises, which are equipped with physical security measures; firewalls protecting the network protect the logical net area; main data systems containing information have burglary protection.</li> <li>• Both external and internal personnel handling the register sign a promise of secrecy and confidentiality.</li> <li>• Users are granted access only to that information which is absolutely vital to perform their duties</li> <li>• Only a person in charge of the system, nominated by the register keeper for this assignment, can grant, alter or cancel the access rights.</li> </ul> |   |
| Informing                            | Bulletins in the entrance halls of SAMK buildings <ul style="list-style-type: none"> <li>• The bulletins tell the audience of the video surveillance and give essential information on handling the information. All entrances to buildings and garages have these bulletins.</li> </ul> Publication in the Internet <ul style="list-style-type: none"> <li>• The document at hand is a public version of data protection announcements of camera surveillance. It is published on SAMK's www-pages.</li> </ul>   |   |
| Data transfer outside EU/ETA         | Data is not disclosed outside EU/ETA  |   |
| Automatic decision-making            | No automatic decision-making  |   |
| Profiling                            | No profiling of registered  |   |

## CampusMoWe user register

Erika Santala

| Title of register                | CampusMoWe customer register   |  |
|----------------------------------|--|--|
| Contact                          | Erika Santala  | erika.santala@samk.fi  |
| Grounds for processing           | Processing is necessary for the performance of the contract Partly also the consent of the data subject  |  |
| Purpose of processing            | <ul style="list-style-type: none"> <li>• Provision and implementation of services</li> <li>• Managing the user relationship and ensuring access to services</li> <li>• Communicating and informing about service changes, new features, and new products</li> <li>• Monitoring the usage rate of services</li> <li>• Running, planning, analysing and collecting statistics on CampusMoWe activities</li> <li>• Opinion and feedback surveys</li> <li>• Preventing, monitoring, and investigating abuse</li> <li>• Marketing (based on consent)</li> </ul> |  |
| Groups of registrants            | CampusMoWen customers  |  |
| Data groups                      | <b>Data group</b>  | <b>Retention period</b>  |
|                                  | First names and surnames   | The data is kept for 5 years after the end of the customer relationship. |
|                                  | Contacts   |  |
|                                  | Higher education details (home university, unit/program)   |  |
|                                  | Access rights  |  |
|                                  | Access and use of services   |  |
|                                  | Information on consents  |  |
|                                  | Other information (added by the data subject)  |  |
|                                  | Recordings of events (publication based on consent)  | 2 years  |
|                                  |  |  |
| Data sources                     | From the person himself/herself (when registering with HAKA)   |  |
| Groups of recipients             | <ul style="list-style-type: none"> <li>• -The service provider WiseGym Oy uses the anonymous data generated from the use of the service for the development and marketing of its own business.</li> </ul>  |  |
| Data transfer outside the EU/EEA | No transfer of data outside the EU or EEA  |  |
| Automatic decision-making        | There is no automatic decision-making  |  |
| Profiling                        | Registrants are not profiled   |  |

## Client register

Julia Vaahtera

| Title of register            | Client register  |  |
|------------------------------|--|--|
| Contact person               | Julia Vahtera<br>Event Coordinator   | julia.vaahtera@samk.fi<br>+358 44 710 3147 |
| Cause for handling           | Handling necessary to complete agreement<br>Consent by the registered  |  |
| Purpose of handling          | <ul style="list-style-type: none"> <li>• For event registrations</li> <li>• For international co-operation</li> <li>• For company co-operation</li> <li>• For national and local co-operation</li> </ul> |  |
| Groups of registered         | Co-operation partners  |  |
| Information groups           | <b>Information group</b>   | <b>Storage time</b>                        |
|                              | First and last name(s)   | 10 yrs                                     |
|                              | Social security number   | 10 yrs                                     |
|                              | Contact information  | 10 yrs                                     |
|                              | Information regarding tuition and work, title  | 10 yrs                                     |
|                              | Photographs of events  | 2 yrs                                      |
|                              | Information based on consent will be removed if consent is cancelled   |  |
| Information sources          | Person him-/herself  |  |
| Groups of receivers          | <ul style="list-style-type: none"> <li>• KOTA statistics by Ministry of Education and Culture receive information on international visitors once a year</li> </ul>                                       |  |
| Data transfer outside EU/ETA | Data is not disclosed outside EU/ETA   |  |
| Automatic decision-making    | No automatic decision-making   |  |
| Profiling                    | No profiling of registered   |  |



## Cost control register

Tero Hämäläinen

|                                  |   |  |
|----------------------------------|---|--|
| <b>Name of the register</b>      | <b>Cost control register</b>  |  |
| Contact person                   | Tero Hämäläinen<br>Head of Facility and Security Services   | tero.hamalainen@samk.fi  |
| Cause for handling               | Legitimate interest of the controller (employment relationship, study right, partnership)   |  |
| Purpose of handling              | Enables access control to the properties of Satakunnan ammattikorkeakoulu Oy.   |  |
| Groups of registered             | SAMK staff, SAMK students, partners who need access   |  |
| Information groups               | <b>Information groups</b>   | <b>Retention period</b>  |
|                                  | First name and surname<br>E-mail<br>Organisation<br>Role<br>Period of validity<br>Access rights<br>ID number<br>PIN code<br>Access stamps | Staff: 5 years<br><br>Students: 1 year after graduation<br><br>Others: 1 year after the end of the partnership |
| Information sources              | SAMK personnel register, SAMK student and study register and the person himself/herself   |  |
| Access to and disclosure of data | The data will not be passed on.   |  |
| Data transfer outside EU/ETA     | Data will not be transferred outside the EU or EEA  |  |
| Automatic decision-making        | There is no automatic decision-making   |  |
| Profiling                        | Registrants are not profiled  |  |

## Eat@Work register description

|                       |   |                            |
|-----------------------|---|----------------------------|
| Title of register     | <b>Eat@Work</b>   |                            |
|                       | <p><i>Register description in accordance with the Personal Data Act</i></p> <p>You are about to adopt or use the Eat@Work application managed by Satakunta University of Applied Sciences.</p> <p>The Eat@Work project aims to improve employee well-being, increase productivity and improve working capacity through a comprehensive nutrition education programme. Participants receive individual and group nutrition counselling and complete a food diary. To support the guidance, participants use an app developed for the project, the Eat@Work app. The app guides people on how to improve and monitor their eating habits.</p> <p>This Privacy Notice describes how your personal data is processed in relation to your use of the Eat@Work application. It also explains what rights you have and how you can influence the processing of your data.</p> <p>Use of the app is voluntary and you can stop using it at any time. If you stop using the app, the data and information collected before you stop using the app can be used for the project.</p> |                            |
| Contact               | Satakunta University of Applied Sciences<br>Satakunnankatu 23, 28101 Pori   | tietosuojavastaava@samk.fi |
| Analytics             | <p>Eat@Work collects anonymous data on the number of users of the application, the storage and use of content. The data collected by analytics is completely anonymous. We use the data to analyse and report on the results of the Eat@Work project. The anonymised data will be stored until 8/2033 in accordance with the instructions of the project sponsor (European Social Fund).</p>  |                            |
| Groups of registrants | <p>We store user IDs for users of the application, which we cannot link to individuals. If the user wishes, he or she can share the content of the food diary he or she fills in with project experts, not with third parties. If the user wishes to stop using the app, we will stop collecting data and delete the user ID. We will keep the data until 8/2033 after the use of the application has been stopped. The data will be stored within the EU. The data will only be available to user support and application administrators.</p>  |                            |
| Your rights           | <p>The user has:</p> <ul style="list-style-type: none"> <li>• The right to receive information from us about him or her.</li> <li>• The right to lodge a complaint with a data protection authority.</li> <li>• The right to delete their own data in the app.</li> <li>• The right at any time to ask us to delete their data.</li> <li>• The right to ask us to correct inaccurate information.</li> </ul> <p>Requests for information or for its deletion or correction should be made by e-mail to: tietosuojavastaava@samk.fi</p>  |                            |

## International Mobility En

Riitta Rissanen

| Name of data file  | International Mobility   |   |
|--|--|---|
| Person responsible for data file   | Riitta Rissanen  | riitta.rissanen@samk.fi<br>+358 44 710 3000 |
| Lawfulness of processing   | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.   |   |
| Purpose of processing personal data  | <ul style="list-style-type: none"> <li>• Administrative tasks.</li> <li>• Planning and developing of international activities.</li> <li>• Listing of incoming and outgoing students, teachers and other staff members for the purpose of               <ul style="list-style-type: none"> <li>○ allocating and monitoring mobility grants</li> <li>○ reports</li> <li>○ statistics</li> <li>○ archives</li> </ul> </li> </ul>  |   |
| Categories of data subjects  | Exchanging students, exchanging personnel, staff representatives on applications and contact persons for university colleges. Applicants for a grant and grantees.   |   |
| Content of data file   | <b>Categories of data</b>  | <b>Retention</b>                            |
|  | <b>PERSONAL INFORMATION</b> <ul style="list-style-type: none"> <li>• surname, first names</li> <li>• personal ID, date of birth</li> <li>• gender</li> <li>• contact details: home address, telephone, telephone, email</li> <li>• nationality</li> <li>• mother tongue</li> <li>• field of study, degree programme, specialization</li> <li>• degree title</li> <li>• organisation, unit</li> <li>• type of education (Bachelor, Master)</li> <li>• number of study years completed before exchange</li> <li>• bank account number</li> <li>• contact person</li> </ul> | 6 years                                     |
|  | <b>EXCHANGE INFORMATION</b> <ul style="list-style-type: none"> <li>• type and level of exchange</li> <li>• timing and duration</li> <li>• exchange destination and country</li> <li>• exchange programme</li> <li>• amount of grant</li> <li>• exchange reportYhteystiedot</li> </ul>  | 6 years                                     |
| <b>AGREEMENT INFORMATION</b> <ul style="list-style-type: none"> <li>• duration</li> <li>• contracting parties</li> <li>• name and country of institution</li> <li>• exchange programme</li> <li>• agreement's field of study</li> <li>• types and number of persons</li> <li>• contact person</li> </ul> | 6 years  |   |
| Regular sources of data  | <ul style="list-style-type: none"> <li>• Basic information for students of SAMK is extracted from the student administration system.</li> <li>• Other information is gathered from users as they fill in the information in the system.</li> </ul>   |   |
| Regular disclosure of data   | <ul style="list-style-type: none"> <li>• The Ministry of Education and Culture: data is submitted annually for the national database Vipunen.</li> <li>• Finnish National Agency for Education: data is submitted twice a year regarding activities financed by EU's Erasmus+ Programme.</li> <li>• With the consent of the person entered in the data file, the university may disclose contact information for selected purposes which promote studies.</li> </ul>   |   |
| Data transfer outside EU/ETA   | Data is not disclosed outside EU/ETA   |   |
| Automated processing   | Decisions based solely on automated processing, including profiling are not used   |   |
| Profiling  | No profiling of registered   |   |

## Knowledge management repository

Jari Iisakkala

|                              |  |  |
|------------------------------|--|--|
| <b>Title of register</b>     | <b>Knowledge management repository</b>   |  |
| Contact person               | Jari Iisakkala   | jari.iisakkala@samk.fi<br>+358 44 710 3801 |
| Cause for handling           | Legitimate interest  |  |
| Purpose of handling          | <p>To contribute to SAMK's goal of increasing the number of degrees and other outputs that underpin our funding, and to improve student guidance and the dissemination of this information to stakeholders within SAMK.</p> <p>To obtain monitoring data on student performance in order to produce summary reports. To facilitate the work of teacher tutors and OPOs and provide management and supervisors with valuable information on the performance of processes. This will analyse data in LOKI (Peppi) using Azure tools and generate reports in MS PowerBI for viewing by interested parties (SAMK staff).</p> |  |
| Groups of registered         | Students and staff   |  |
| Information groups           | <b>Information groups</b>  | <b>Retention period</b>                    |
|                              | First names and surnames   | 5 years                                    |
|                              | E-mail address   | 5 years                                    |
|                              | Contacts   | 5 years                                    |
|                              | Attendance/absence enrolment data, performance data and basic training data  | 5 years                                    |
|                              | Information on students' credit, graduation, distinction and HOPS data. Admission rates and exemptions   | 5 years                                    |
|                              | Staff's teaching knowledge, roles and responsibilities   | Permanent                                  |
| Information sources          | Logs   |  |
| Groups of receivers          | The data will not be disclosed outside SAMK.   |  |
| Data transfer outside EU/ETA | The data will not be transferred outside the EU or EEA.  |  |
| Automatic decision-making    | There is no automatic decision-making  |  |
| Profiling                    | Registrants are not profiled   |  |

## Library's client register

Jussi Kärki

| Title of register                    | Library's client register  |   |
|--------------------------------------|--|---|
| Contact person                       | Jussi Kärki<br>Head of Library Services  | jussi.karki@samk.fi<br>+358 44 710 3051 |
| Cause for handling                   | Handling necessary to complete agreement   |   |
| Purpose of handling                  | <ul style="list-style-type: none"> <li>To manage a client relationship</li> <li>Statistics</li> </ul>  |   |
| Groups of registered                 | Library's clients  |   |
| Information groups                   | <b>Information group</b>   | <b>Storage time</b>                     |
|                                      | First and last name(s)   | the client's custom                     |
|                                      | Social security number   | the client's custom                     |
|                                      | Address  | the client's custom                     |
|                                      | Phone  | the client's custom                     |
|                                      | Email  | the client's custom                     |
|                                      | Number of library card   | the client's custom                     |
|                                      | Password of library card (PIN-code)  | the client's custom                     |
|                                      | Information on material borrowed by client   | until next borrowing of material        |
|                                      | Information on material bookings   | the client's custom                     |
|                                      | Information on payments  | the client's custom                     |
|                                      | Information on borrowing bans  | the ban's time                          |
|                                      | Statistics group for statistics  | the client's custom                     |
|                                      | Client group for defining borrowing rights   | the client's custom                     |
|                                      | Validity of client information   | 5 yrs from last borrowing               |
|                                      | Notifications  | as long as necessary                    |
| Saving time and saving person        | the client's custom  |   |
| Quantitative registers of borrowings | the client's custom  |   |
| Information sources                  | <ul style="list-style-type: none"> <li>Students' contact information included in student registers</li> <li>Information given by client</li> <li>Information saved in library's operation</li> <li>Information saved by personnel</li> </ul>   |   |
| Groups of receivers                  | <ul style="list-style-type: none"> <li>Information is transferred from the library's client register to library's Finna client network, when the client signs in the service.</li> <li>Information is transferred from the client register to Finna client network and Paytrail Plc, when the client pays the network fee in Finna.</li> <li>Person and payment information can be given to a collecting company.</li> </ul> |   |
| Data transfer outside EU/ETA         | Data is not disclosed outside EU/ETA   |   |
| Automatic decision-making            | No automatic decision-making   |   |
| Profiling                            | No profiling of registered   |   |

## Marketing register

Jani Wahlman

|                              |  |   |
|------------------------------|--|---|
| <b>Title of register</b>     | <b>Marketing register</b>  |   |
| Contact person               | Jani Wahlman<br>Head of Communications   | hanna.valtokivi@samk.fi<br>+358 44 710 3987         |
| Cause for handling           | Consent by the registered  |   |
| Purpose of handling          | <ul style="list-style-type: none"> <li>• Educational marketing</li> <li>• Informing of events</li> <li>• Marketing of events</li> <li>• SAMK news</li> </ul> |   |
| Groups of registered         | Partners, student counsellors, news bulletin subscribers   |   |
| Information groups           | <b>Information group</b>   | <b>Storage time</b>                                 |
|                              | First and last name(s)   | Information will be removed if consent is cancelled |
|                              | Contact information  | Information will be removed if consent is cancelled |
| Information sources          | Person him-/herself  |   |
| Groups of receivers          | Information not forwarded.   |   |
| Data transfer outside EU/ETA | Data is not disclosed outside EU/ETA   |   |
| Automatic decision-making    | No automatic decision-making   |   |
| Profiling                    | No profiling of registered   |   |

## Personnel register

Jari Lahti

|                              |  |  |
|------------------------------|--|--|
| <b>Title of register</b>     | <b>Personnel register</b>  |  |
| Contact person               | Jari Lahti<br>Head of Human Resources  | jari.lahti@samk.fi<br>+358 44 710 3130 |
| Cause for handling           | Statutory obligations<br>Privileged interest of register keeper  |  |
| Purpose of handling          | <ul style="list-style-type: none"> <li>• For creating the user identifier, which enables access to our own systems, other universities' systems and other national applications.</li> <li>• For development discussions and competence survey</li> <li>• For organizing tuition</li> <li>• For handling study unit feedback</li> <li>• For managing study performances</li> <li>• For statistics plus planning and clarification issues by authorities</li> <li>• For purchases and for checking and paying invoices</li> </ul>  |  |
| Groups of registered         | Personnel on a contract  |  |
| Information groups           | <b>Information group</b>   | <b>Storage time</b>                    |
|                              | First and last name(s)   | permanent                              |
|                              | Photograph   | toV + 2 yrs                            |
|                              | Social security number   | permanent                              |
|                              | Contact information  | permanent                              |
|                              | Present / Absent   | permanent                              |
|                              | Educational information  | permanent                              |
|                              | Information regarding tuition and work, title  | permanent                              |
|                              | Course feedback  | 2 yrs                                  |
| Information sources          | Person him-/herself  |  |
| Groups of receivers          | <ul style="list-style-type: none"> <li>• KOTA statistics by Ministry of Education and Culture receive information on international visitors once a year (social security number, education, lecturers' qualification, person year, areas of supervision, publications)</li> <li>• Recruitment information to Ministry of Education and Culture</li> <li>• kyvyt.fi: first and last name(s), email address</li> <li>• occupational health services, more information<br/><a href="https://www.terveystalo.com/en/Company/Privacy-statement/">https://www.terveystalo.com/en/Company/Privacy-statement/</a></li> </ul> |  |
| Data transfer outside EU/ETA | Data is not disclosed outside EU/ETA.<br>Exceptionally, persons participating in staff exchange have their name and email address sent to the receiving university.  |  |
| Automatic decision-making    | No automatic decision-making   |  |
| Profiling                    | No profiling of registered   |  |
| Explanation                  | toV = time of validity, in this case the duration of the assignment  |  |

## Project management register

Pia Halttunen

| Title of register            | Project management register   |                              |
|------------------------------|---|------------------------------|
| Contact person               | Pia Halttunen   | pia.halttunen@samk.fi        |
| Cause for handling           | <p>In cases of research, development and innovation activities and cooperation, the processing of data is based on the statutory tasks of the university of applied sciences, which are described in the Act on Universities of Applied Sciences (932/2014). Otherwise, the processing of personal data in the register is based on a material connection or the performance of a contract to which the data subject is party. For participants in organised events, the processing of personal data is based on the consent given by the data subjects when registering for the event.</p> |                              |
| Purpose of handling          | <ul style="list-style-type: none"> <li>• carrying out research, development and innovation activities</li> <li>• managing stakeholder relations</li> <li>• implementation of cooperation projects</li> <li>• marketing and information</li> <li>• organising events</li> </ul>  |                              |
| Groups of registered         | <p>The register contains the participants identified in the projects. A participant is defined as SAMK and an external person belonging to the target group of the project.</p>   |                              |
| Information groups           | <b>Information group</b>  | <b>Säilytysaika</b>          |
|                              | First and last name(s)  | period of validity + 5 years |
|                              | Contact   | period of validity + 5 years |
|                              | Job title   | period of validity + 5 years |
|                              | Employer or organisation to be represented  | period of validity + 5 years |
|                              | Food restrictions (if the project involves events)  | disposed of after the event  |
|                              | Revisions may be notified on a project-by-project basis   |                              |
| Information sources          | Person him-/herself   |                              |
| Groups of receivers          | <p>Depending on the project, lists of participants in events are handed over to the project's sponsors.</p> <p>The data necessary for catering and identification purposes will be disclosed to the event organisers' partners and will be destroyed immediately after the event.</p>   |                              |
| Data transfer outside EU/ETA | Data is not disclosed outside EU/ETA  |                              |
| Automatic decision-making    | No automatic decision-making  |                              |
| Profiling                    | No profiling of registered  |                              |



## Register of jobseekers

Jari Lahti

|                              |  |   |
|------------------------------|--|---|
| <b>Title of register</b>     | <b>Register of jobseekers</b>  |   |
| Contact person               | Jari Lahti<br>Head of Human Resources  | jari.lahti@samk.fi<br>+358 44 710 3130                        |
| Cause for handling           | A legitimate interest based on a material connection between SAMK and the data subject when the data subject applies for a job at SAMK.  |   |
| Purpose of handling          | Implementation and management of recruitment measures; processing applications; assessing the suitability of job applicants; and liaising on job search and recruitment matters.                           |   |
| Groups of registered         | People applying for a job at SAMK  |   |
| Information groups           | <b>Information groups</b>  | <b>Retention period</b>                                       |
|                              | First names and surnames   | Year of application + 2 years, for the selected tov + 5 years |
|                              | Date of birth  | Year of application + 2 years, for the selected tov + 5 years |
|                              | Contacts   | Year of application + 2 years, for the selected tov + 5 years |
|                              | Education and experience: education, language skills, courses attended, profession, work experience, any specific skills, current and previous employment, duration and quality of employment, references. | Year of application + 2 years, for the selected tov + 5 years |
|                              | Possible job application, CV and photo   | Year of application + 2 years, for the selected tov + 5 years |
|                              | Information relating to personal and aptitude assessments  | Year of application + 2 years, for the selected tov + 5 years |
|                              | Other information related to the job search and recruitment process, as well as other information provided by the job applicant himself/herself in his/her application and CV.                             | Year of application + 2 years, for the selected tov + 5 years |
| Information sources          | From the person himself/herself  |   |
| Groups of receivers          | Statistics on recruitment for OKM  |   |
| Data transfer outside EU/ETA | The data will not be transferred outside the EU or EEA.  |   |
| Automatic decision-making    | There is no automatic decision-making  |   |
| Profiling                    | Registrants are not profiled   |   |
| Explanation                  | tov = time of validity, in this case the duration of the assignment  |   |

## Register of research, development and theses

**This guideline is applicable to the Research and Development activities carried out by SAMK staff and to the theses of SAMK students.**

[Alla oleva teksti tiedostomuodossa](#)

### Information for the research participant

- Staff use: you are participating in research or development activities carried out by Satakunta University of Applied Sciences.
- Student uses: you are participating in a research/study related to the thesis of Satakunta University of Applied Sciences.

This notice describes how your personal data will be processed in the survey.

Participation in this survey is voluntary. You can also choose to stop taking part in the survey. However, if you stop taking part, the data collected before you stop can still be used in the study. This Privacy Notice explains in more detail what your rights are and how you can influence the processing of your data.

#### 1. Controller of the research, development or thesis

##### Staff use:

Satakunta University of Applied Sciences

Address: Satakunnankatu 23, 28101 Pori

##### Used by the student, if not collecting material for SAMK's use:

Student:

Address:

Contact person for research matters: (person to be contacted by the respondents for data protection issues related to the research)

Name:

Address:

Phone number:

E-mail address:

[If there are several controllers, please also mention the other controllers here.]

#### 2. Description of the investigation or other inquiry and the purpose of the processing of personal data

*The purpose of the processing indicates the purpose of the research for which the personal data are processed. Describe in a way that the data subject understands how his or her data will be processed. The text should be understandable and accessible to the target group.*

#### 3. The parties involved in the research or development activity as a collaborative project and the division of responsibilities (you can delete this if it is not a collaborative project)

*In the case of a joint project involving several parties (organisation/department or student), this describes the division of responsibilities between the parties with regard to the processing of personal data.*

*If the organisations carrying out the research together process the same personal data in the research and jointly determine the purposes and means of the processing of personal data, they are joint controllers.*

##### **If more than one organisation is involved in the data collection, you can use the text below:**

The organisations or other entities listed in point 1 are joint controllers for the purposes of this study, i.e. they jointly determine the purposes and means of the processing of personal data.

Subjects may submit any request to exercise their data subject rights in relation to this research to the contact person below:

*[contact details]*

The contact person will also forward the request to other organisations or other entities acting as joint controllers, as appropriate.

#### 4. The researcher or team responsible for the research or development activity or the author of the thesis

*The responsible researcher/thesis author is the person appointed by the controller or the student is the controller who is responsible for carrying out the research. A corresponding team may also be appointed.*

Name:

Address:

Phone number:

E-mail address:

#### 5. Contact details of the Data Protection Officer

The Data Protection Officer of Satakunta University of Applied Sciences is Osmo Santamäki. He can be contacted by e-mail at [tietosuojavastaava@samk.fi](mailto:tietosuojavastaava@samk.fi).

#### 6. Persons carrying out research or development work

*All those who have the right to process the data in the register during the course of the research or development activities are recorded here. It is not necessary to list individual persons, but they can be listed in groups, e.g. authors of thesis, researchers in the research group "Supporting work capacity", researchers in project x*

#### 7. Subject and duration of the research or development work/Topic and duration of the thesis

Name of research/development project: [name]

Title of thesis: [name]

Case study

Follow-up study

Duration of processing of personal data:

*If the exact duration is known, it is indicated here. If not, this will explain how the duration of processing is determined.*

#### 8. Legal basis for processing personal data

Personal data are processed on the following grounds pursuant to Article 6(1) of the General Data Protection Regulation:

*In practice, in scientific research, the basis for processing is almost always either the consent of the subject or scientific or historical research in the public interest. If you are unsure about the basis for processing, please contact the Research Ethics Support [tutkimusetiikka@samk.fi](mailto:tutkimusetiikka@samk.fi)*

the subject's consent

compliance with a legal obligation of the controller

a task carried out in the public interest/exercise of official authority vested in the controller:

Scientific or historical research or statistics

archiving of research data

pursuit of the legitimate interests of the controller or of a third party

which legitimate interest is at stake:

#### 9. What information we collect and store

*This describes the data or types of data that will be collected and stored on the data subject/recorded. Identifying information about the person is specified (name, date of birth, contact details) and other survey information is specified. A separate annex may be used if there is a large amount of identifying information.*

##### A. Sensitive personal data

*Specify whether sensitive data is collected and stored.*

No sensitive personal data is processed in the research/development activities or in the thesis.

OR

The research/development or thesis will process the following sensitive personal data:

Race or ethnic origin

Political opinions

Religious or philosophical beliefs

Trade union membership

Genetic information

Processing of biometric data for the purpose of uniquely identifying a person

Health

Sexual behaviour or orientation of a natural person

According to Article 9(2) of the GDPR, the processing of sensitive data is based on the following legal basis:

Consent of the subject/participant

Scientific or historical research purpose or statistical purpose

The subject/participant has made the processed sensitive data public

Other reason (which?):

The research or development work involves the processing of criminal conviction or misdemeanor data.

#### 10. Where personal data is collected

*This describes where the data to be stored comes from.*

#### 11. Transfer or disclosure of data to others

*This tells you whether personal data are regularly transferred or disclosed to others. What information is disclosed, where it is disclosed and the basis for the disclosure. This also describes any transfer of personal data to a processor (e.g. a subcontractor).*

#### 12. Transfer or disclosure of data outside the EU or the European Economic Area

*If not moved, tick Not moved*

*If transferred, please identify the legal basis under the GDPR that allows the transfer (e.g. Commission decision on adequacy under Article 45 / binding corporate rules under Article 47 / standard data protection clauses under Article 46(2) / exceptions and safeguards under Article 49, such as explicit consent of the data subject to the proposed transfer after having been informed of the risks involved).*

*Where possible, the information should include a link to the document used or information on where and how to access information on that document.*

*The most common safeguard is the Commission's standard contractual clauses (Article 46(2) of the Regulation), see. [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)*

#### 13. Automated decision-making

No automatic decisions are made.

*Scientific research does not usually involve automated decisions (e.g. profiling) that may have legal or other significant effects on subjects.*

#### 14. Principles for the protection of personal data

The information is confidential.

Protection of manual data: \_\_\_\_

Data processed in information systems:

user name password access registration access control

other, which:

Processing of direct identification data:

Direct identifiers are deleted at the analysis stage

Data will be analysed using direct identifiers because (reason for keeping direct identifiers):

#### 15. Processing of personal data after the end of research or development

Destruction of the research or other records

The research register or other register is archived:

without identification data with identification data

Where will the data be archived and for how long:

#### 16. What rights you have as a registered/registered person and how to opt-out

The contact person for matters relating to the rights of the person under investigation who can be contacted is *indicate the person responsible for point 1*

##### Withdrawal of consent (Article 7 GDPR)

You have the right to withdraw your consent if the processing of your personal data is based on consent. Withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

##### Right of access (Article 15 of the GDPR)

You have the right to know whether your personal data will be processed in the project and what personal data will be processed in the project. You can also request a copy of the personal data being processed if you wish.

##### Right to rectification (Article 16 of the GDPR)

If there are inaccuracies or errors in the personal data we process about you, you have the right to request that they be corrected or completed.

##### Right to erasure (Article 17 GDPR)

You have the right to request the deletion of your personal data in the following cases:

1. You have the right to request the deletion of your personal data in the following cases:
2. the personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
3. you withdraw the consent on which the processing was based and there is no other lawful basis for the processing
4. you object to the processing (see below for a description of the right to object) and there is no legitimate ground for the processing
5. the personal data have been unlawfully processed; or
6. the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject.

However, there is no right to erasure if erasure would prevent or seriously undermine the purpose of the processing for the purposes of scientific research.

#### Right to restriction of processing (Article 18 GDPR)

1. You have the right to restrict the processing of your personal data in one of the following circumstances:
2. you contest the accuracy of your personal data, in which case the processing is restricted for a period of time during which the university can verify the accuracy of the data.
3. the processing is unlawful and you object to the erasure of your personal data and instead request the restriction of their use
4. the University no longer needs the personal data concerned for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims
5. you have objected to the processing of personal data (see below for more details) pending verification of whether the legitimate grounds of the controller override those of the data subject.

#### Right to data portability (Article 20 of the GDPR)

You have the right to receive the personal data you provide to the University in a structured, commonly used and machine-readable format, and the right to transfer such data to another controller without the University's hindrance, if the legal basis for the processing is consent or contract, and the processing is carried out automatically.

When you exercise your right to data portability, you have the right to have your personal data transferred directly from one controller to another, where technically feasible.

#### Right to object (Article 21 GDPR)

You have the right to object to the processing of your personal data if the processing is based on a public interest or legitimate interest. In this case, the University may not process your personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or where it is necessary for the establishment, exercise or defence of legal claims. The University may also continue to process your personal data where it is necessary for the performance of a task carried out in the public interest.

#### Exception to rights

The rights described in this paragraph may be derogated from in certain individual cases on the grounds laid down in the General Data Protection Regulation and the Finnish Data Protection Act to the extent that the rights prevent or greatly hinder the achievement of the scientific or historical research purpose or statistical purpose. The need to derogate from the rights is always assessed on a case-by-case basis.

#### Right of appeal

You have the right to lodge a complaint with the Office of the Data Protection Ombudsman if you believe that your personal data have been processed in breach of applicable data protection legislation.

Contact details:

Office of the Data Protection Ombudsman

Visiting address: Ratapihantie 9, 6th floor, 00520 Helsinki, Finland

Postal address: P.O. Box 800, 00521 Helsinki, Finland

Switchboard: 029 56 66700

Fax: 029 56 66735

E-mail: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

## SAMK EduTravel Client register

Maaria Berg

|                              |   |   |
|------------------------------|---|---|
| <b>Name of data file</b>     | <b>SAMK EduTravel Client register (updated 10.3.2022)</b>   |   |
| Contact person               | Maaria Berg, Manager of SAMK EduTravel  | maaria.berg@samk.fi /<br>edutrael@samk.fi;<br>tel. 044 710 3351   |
| Cause for handling           | necessary to complete agreement, consent to data gathering  |   |
| Purpose of handling          | Event & Trips participants registrations, international cooperation, company cooperation, national and local cooperation, marketing in different channels |   |
| Groups registered            | Co-operation partners and their customers   |   |
| Information groups           | <b>Information group</b>  | <b>Storage time</b>   |
|                              | First and last name(s)  | 10 years  |
|                              | Social security number  | 10 years  |
|                              | Contact information   | 10 years  |
|                              | Information regarding tuition and work, title   | 10 years  |
|                              | Photographs of events   | <b>5 years (due lack of marketing photos of travel groups after 2020 /Covid-19_removed until next travel group photos on 2023?+ 2 years, by 2025)</b> |
|                              |   | Information based on consent will be removed if consent is cancelled  |
| Information sources          | Person self / photographer /B2B customer /co-operator   |   |
| Groups of receivers          | KOTA statistics by Ministry of Education and Culture receive information on international visitors once a year  |   |
| Data transfer outside EU/ETA | Data is not disclosed outside EU/ETA  |   |
| Automatic decision-making    | No automatic decision-making  |   |
| Profiling                    | No profiling of registered  |   |



## Service Centre Soteekki's register

Riikka Tupala

| Title of register            | Service Centre Soteekki's register  |   |
|------------------------------|---|---|
| Contact person               | Riikka Tupala<br>Service advisor  | riikka.tupala@samk.fi<br>+358 44 710 3486 |
| Cause for handling           | Handling necessary to complete agreement  |   |
| Purpose of handling          | <p>Service Centre Soteekki is a learning environment maintained by Satakunta University of Applied Sciences. The students finish here a period of practical training, included in the curriculum, with 5-10 credits. Under the supervision of service counsellors and teachers/lecturers, the students plan and implement services supporting well-being. The services are produced together with actors of the public, private and third sector, in such a way that they do not compete with other actors in the area. In the operation, client information is gathered from the service orderers. The services include e.g. support and improvement of well-being of children, youngsters, working-aged and aged, both individually and in groups.</p> <p>The activities involve the collection of information about the client or the client's guardian/carer provided by the client. Written consent for the processing of data is obtained from all customers who disclose data. The information is used to ensure the safety, reliability and quality of services. The data is used to maintain customer information for billing, register development, error correction, ability-to-pay checks, and to verify the accuracy of business information, as well as for customer relationship management, communication (such as changes in service), and marketing and promotion of other services offered by the Registrar. You can contact us by phone, post or e-mail. When the customer discloses information, the information about the controller (name and contact details), the purpose of the processing of the personal data to be collected, information about the regular disclosures of personal data and information about the rights of the data controller will be provided.</p> <p>The customer has the right to:</p> <ul style="list-style-type: none"> <li>• receive information on the processing of personal data</li> <li>• get access to data</li> <li>• correct data</li> <li>• delete data (right to be forgotten)</li> <li>• restrict the processing of data</li> <li>• transfer data from one system to another.</li> </ul> |   |
| Groups of registered         | Client of Service Centre Soteekki   |   |
| Information groups           | <b>Information group</b>  | <b>Storage time</b>                       |
|                              | First and last name(s)  | tov + 5 yrs                               |
|                              | Social security number  | tov + 5 yrs                               |
|                              | Contact information   | tov + 5 yrs                               |
|                              | Information on need, plan, implementation and assessment  | tov + 5 yrs                               |
| Information sources          | Information is received from the service orderer. In addition, existing information formed in connection with service providing or maintaining.   |   |
| Groups of receivers          | Information is released only to the client, and with a written consent by the client, to a relative and workers of social and health care.  |   |
| Data transfer outside EU/ETA | Data is not disclosed outside EU/ETA  |   |
| Automatic decision-making    | No automatic decision-making  |   |
| Profiling                    | No profiling of registered  |   |
| Explanation                  | tov = time of validity, in this case the period of customer relationship  |   |

Somebody's Privacy Policy

<https://somebody.samk.fi/yhteystiedot>

## Student and study register

Janne Santala

| Title of register    | Student and study register   |   |
|----------------------|--|---|
| Contact person       | Janne Santala<br>Head of Student Services  | janne.santala@samk.fi<br>+358 44 710 3012 |
| Cause for handling   | To manage legal obligations  |   |
| Purpose of handling  | <ul style="list-style-type: none"> <li>To manage tasks connected with student relationship (Personal Data Act § 8 and Universities of Applied Sciences Act 932/2014) ? ammattikorkeakoululaki 351/2003) EIKÖ tämä ole jo vanha? vai onko se edelleen pohjana?.</li> <li>To follow student's studies and presence (Student Financial Aid Act 65/1994 with amendments § 41).</li> <li>For statistics and planning and investigation by authorities (Personal Data Act ch. 4)</li> <li>Decision by the National Archives 15.9.2017</li> <li>For creating the user identifier, which enables access to our own systems, other universities' systems and other national applications.</li> <li>For supportive services for students</li> <li>For maintaining contact channels for students (e.g. email)</li> <li>For using services by the university of applied sciences</li> <li>For learning counselling</li> <li>To develop and ensure quality of educational operation</li> <li>To manage library's client relationship</li> <li>Information is used to produce data for learning and study analytics</li> <li>To follow surveillance camera recordings of the exam room to prevent and examine deceit</li> <li>For educational marketing</li> </ul>   |   |
| Groups of registered | Students   |   |
| Information groups   | <b>Information group</b>   | <b>Storage time</b>                       |
|                      | First and last name(s)   | Permanent                                 |
|                      | Social security number   | Permanent                                 |
|                      | Contact information  | Permanent                                 |
|                      | Registering for present/absent, performance information, basic education information   | Permanent                                 |
|                      | Information on students' study rights, graduation, resignation and HOPS (personal curriculum). Crediting and exemptions.   | Permanent                                 |
|                      | Anonymous course feedback  | Permanent                                 |
| Information sources  | <ul style="list-style-type: none"> <li>Opintopolku.fi, maintained by the Ministry of Education and Culture plus National Board of Education, gives students' first and last name(s), social security number, gender, basic education and contact information</li> <li>Contact information saved by the students</li> <li>Evaluations by the teachers/lecturers</li> <li>Present/absent information by the students, maintenance of contact information</li> <li>Markings by the Student Services, e.g. graduation and resignation</li> <li>Anonymous feedback by the students</li> </ul>   |   |
| Groups of receivers  | <p>Regular information transfer to other authorities in Finland.</p> <ul style="list-style-type: none"> <li>Virta Tietovaranto (a bought service from CSC by the Ministry of Education and Culture) (HE 44/2012) saves: information on degree and study performances with the grades of education leading to a degree or not. In addition, information on students, that is people and their study rights, present or absent announcements, are saved. Student information is saved of education leading to a degree. From Virta data transfer information goes to: <ul style="list-style-type: none"> <li>KELA (Social Insurance Institution of Finland): According to the Student Financial Aid Act, forwarding information on all present students to KELA's Student Financial Aid Centre takes place once a month. (Student Financial Aid Act 65/1994 with amendments § 41).</li> <li>KELA: Information on performances of students receiving financial aid is forwarded annually to KELA in October as they were on 31 July. (Student Financial Aid Act 65/1994 with amendments § 41).</li> <li>STATISTICS FINLAND: In September the number of students on 20 September and in January the taken degrees between 1 Jan. and 31 Dec.</li> <li>FIONA: Remote access service by Statistics Finland for scientific research of material (JulkiL 621/1999 and HetiL 523/1999). The applicant must present an official research plan to the register keeper and announce the name of the researcher in charge.</li> <li>JOOPAS consortium: PURO service, electronic transfer service of study performances</li> <li>Arvo – efficiency information service by the educational administration: to be used for student feedback questionnaire at the graduation stage at universities of applied sciences (AVOP)</li> <li>CALEIDON Ltd: The learner sees at TUUDO service his/her own information saved in VIRTA study information service</li> <li>VALVIRA (National Supervisory Authority for Welfare and Health): study and degree information <ul style="list-style-type: none"> <li>University Admissions Finland consortium</li> </ul> </li> <li>EMREX: exchange of university students' performance information between universities</li> </ul> </li> </ul> |   |



|                              |   |
|------------------------------|---|
|                              | <ul style="list-style-type: none"> <li>• Necessary information on international students to Porin YH-asunnot (accommodation) and social and health authorities.</li> <li>• kyvyt.fi, Urkund: First and last name(s), email address</li> <li>• Information is released as electronic documents.</li> </ul> |
| Data transfer outside EU/ETA | Data is not disclosed outside EU/ETA.<br>Exceptionally, people participating in student exchange have their name and email address sent to the receiving university or place of practical training.   |
| Automatic decision-making    | No automatic decision-making  |
| Profiling                    | No profiling of registered  |

## Testbed customer register

Mervi Vähätalo

|                              |  |  |
|------------------------------|--|--|
| <b>Title of register</b>     | <b>Testbed customer register</b>   |  |
| Contact person               | Mervi Vähätalo<br>Testbed coordinator, lecturer  | mervi.vahatalo@samk.fi<br>+358 44 710 3983                     |
| Cause for handling           | Consent of the data subject  |  |
| Purpose of handling          | <ul style="list-style-type: none"> <li>• - Communicating events related to wellbeing technology and testbed activities</li> <li>• - Communicating Testbed activities (e.g. business cooperation, international and national cooperation)</li> <li>• - Collecting feedback</li> </ul> |  |
| Groups of registered         | Technology companies, social and health operators  |  |
| <b>Information groups</b>    | <b>Information groups</b>  | <b>Retention period</b>  |
|                              | First names and surnames   | 10 years   |
|                              | Social ID  | 10 years   |
|                              | Contacts   | 10 years   |
|                              | Teaching and work-related information, title   | 10 years   |
|                              | Photos of events   | 2 years  |
|                              |  | Data based on consent will be deleted if consent is withdrawn. |
| Information sources          | From the person himself/herself  |  |
| Groups of receivers          | In addition to SAMK, data will be shared with the organisations involved in the Satakunta testbed coordination group.  |  |
| Data transfer outside EU/ETA | The data will not be transferred outside the EU or EEA.  |  |
| Automatic decision-making    | There is no automatic decision-making  |  |
| Profiling                    | Registrants are not profiled   |  |

## WANDER customer and cooperation register

Martti Latva

|                              |   |   |
|------------------------------|---|---|
| <b>Title of register</b>     | <b>WANDER customer and cooperation register</b>   |   |
| Contact person               | Martti Latva<br>Lead Project Manager  | martti.latva@samk.fi<br>+358 44 710 3060          |
| Cause for handling           | Consent of the data subject   |   |
| Purpose of handling          | <ul style="list-style-type: none"> <li>• Event registrations</li> <li>• For international cooperation</li> <li>• Corporate cooperation</li> <li>• National and local cooperation</li> </ul> |   |
| Groups of registered         | Partners  |   |
| Information groups           | <b>Information groups</b>   | <b>Säilytysaika</b>                               |
|                              | First names and surnames  | 10 years  |
|                              | Social ID   | 10 years  |
|                              | Contact   | 10 years  |
|                              | Teaching and work-related information, title  | 10 years  |
|                              | Photos of events  | 2 years   |
|                              |   | The data will be deleted if consent is withdrawn. |
| Information sources          | From the person himself/herself   |   |
| Groups of receivers          | <ul style="list-style-type: none"> <li>• Data on international visitors are transferred to the OKM's KOTA statistical database once a year</li> </ul>                                       |   |
| Data transfer outside EU/ETA | Data will not be transferred outside the EU or EEA  |   |
| Automatic decision-making    | There is no automatic decision-making   |   |
| Profiling                    | Registrants are not profiled  |   |

# Whistleblowing

Jari Lahti

Privacy policy, Whistleblowing

## Contact

Jari Lahti

Head of Human Resources

[jari.lahti@samk.fi](mailto:jari.lahti@samk.fi)

+358 44 710 3130

## Grounds for processing

The legal basis is compliance with a legal obligation (Article 6(1)(c) of the GDPR). This obligation is laid down in the European Union Directive on the protection of persons who report breaches of Union law (EU 2019/1937) and in Law 1171/2022 on the protection of persons who report breaches of Union and national law, which transposes the Directive at national level. The notifying person may make the notification under his or her name, but the notification must not contain any other direct identifying information about him or her, such as address details, etc.

If the notifier exceptionally leaves, for example, his/her contact details on the notification form, the processing of personal data is based on the data subject's consent (Article 6(1)(a) of the GDPR).

## Purpose of processing

The information sent and received on the Satakunta University of Applied Sciences' notification channel is processed in order to investigate and respond to suspicions of misconduct referred to in the notifications. The investigation of suspected misconduct may require interviews with individuals, documentation of interviews/investigations, decisions on action to be taken in response to the investigation. The processing of personal data is necessary in order to fulfil the obligations of the Directive (EU 2019/1937) identified below to investigate allegations of abuse.

## Categories of personal data processed and retention periods

- The categories of personal data processed are:
- first names, surnames, email, public name and username of the processors of the notifications
- notifiers are not required to provide any direct identification information other than their name, but may include their own information about another person/persons as part of the notification, either as part of the written notification or through metadata in the attachments.
- when investigating allegations of wrongdoing, persons who have been involved in the activities to which the allegation relates may be interviewed
- in principle, the personal data to be processed are first and last names and contact details. Other personal data may also need to be processed in connection with the reported suspected abuse.

## Storage of personal data:

- notifications are securely deleted from the notification channel service after a retention period of one year, after which the notification is stored in the UAS case management system.
- If there is no statutory retention period for the stored data, the retention periods for the notifications and the data generated by the processing of the notification are determined on the basis of the enforcement and verification of the interests, rights, obligations and legal protection of the natural or legal person; the statute of limitations in tort law and the statute of limitations in criminal law.

## Sources of information

- The notifier's personal data, in addition to his/her name, will be obtained from the notifier if he/she provides them.
- the personal data of the third party are obtained from the notifier and, in the case of Satakunta University of Applied Sciences staff, from the controller's files, possibly supplemented by contact details.

## Recipients or categories of recipients of personal data

Personal data is received by the authority, if the report requires the suspicion of misconduct to be reported to the authority, possibly by the UAS Board of Trustees, front-line staff, human resources and interested parties.

## Data transfer outside the EU/EEA

The data will not be transferred outside the EU or EEA.

## Principles of data protection

Access to the data is only available to the processors of the notification channel designated by the controller. Where responses to notifications require preparation, this takes place outside the channel, with access being granted to the persons designated as preparers. Access is limited by user IDs and access rights.

## Automatic decision-making

There is no automatic decision-making.

### **Profiling**

Registrants are not profiled.

### **Rights of the data subject**

The data subject has the right under the GDPR to:

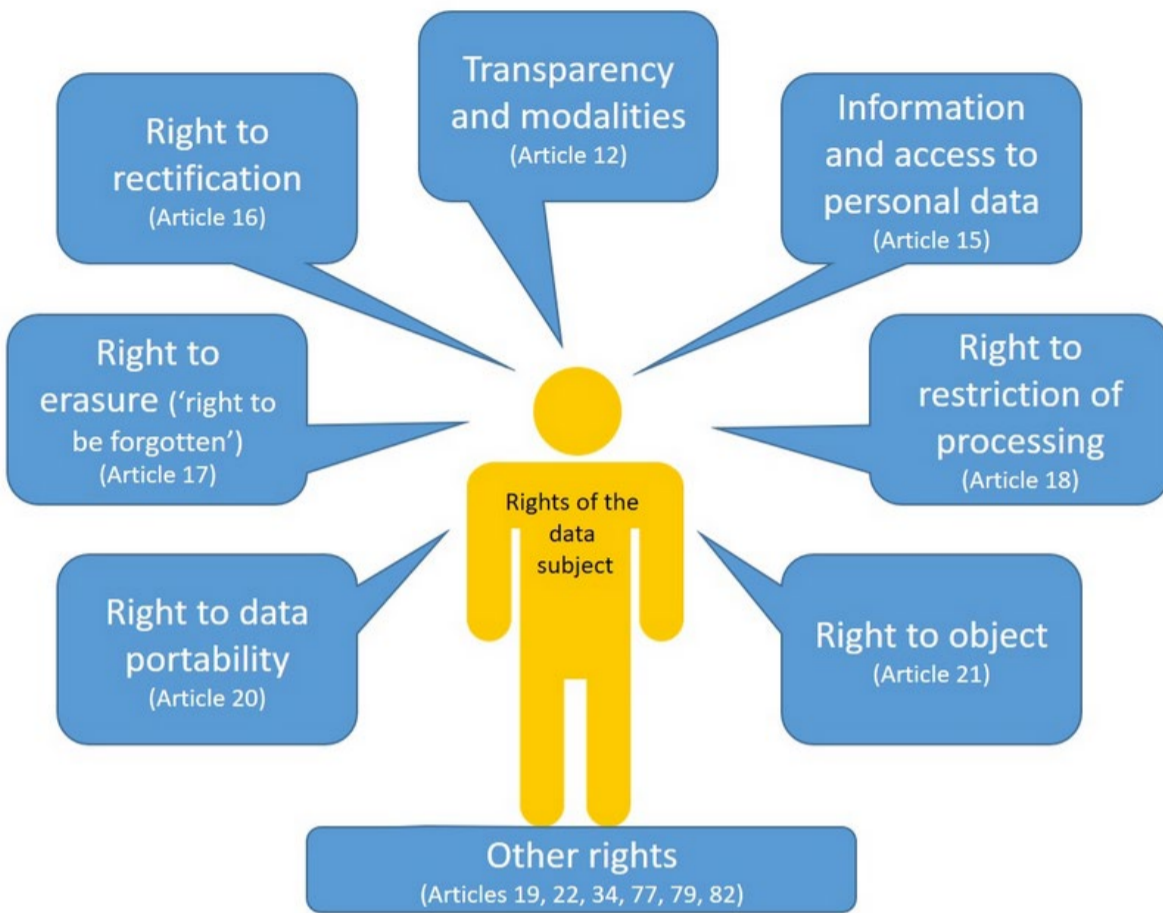
- receive information about the processing of personal data, unless an exception is expressly provided for by law
- check the data concerning him or her and correct inaccurate or missing data
- erase their data (not applicable if the processing is based on a legal ground or a task carried out in the public interest)
- restrict the processing of their data
- object to the processing of their data where there is a public or legitimate interest in the processing
- request the transfer of personal data which he or she has provided to the controller, where the ground for processing is consent or a contract
- withdraw his or her consent
- the controller's obligation to notify the rectification/erasure/restriction of processing of personal data
- not to be subject to automated decision-making (the data subject may allow automated decision-making with his or her consent)

The data subject can exercise his or her rights by contacting the contact person or the data protection officer indicated in the notice. For further information on the rights of the data subject, please contact the contact person and/or the Data Protection Officer.

If the processing of personal data does not require the identification of the data subject without further information and the controller is unable to identify the data subject, the rights of access, rectification, erasure, restriction of processing, notification and transfer do not apply.

You have the right to lodge a complaint with the Office of the Data Protection Ombudsman if you believe that your personal data have been processed in breach of applicable data protection legislation. The contact details of the Data Protection Officer can be found on the privacy notices pages. All requests will be dealt with on a case-by-case basis.

Rights of the data subject  
Rights



<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679#d1e2161-1-1>

Making a request for a review

## **Making a request to the controller**

The request for an inspection is made in person or by means of a hand-signed document or other reliable means of verification. The request shall be addressed to the Data Protection Officer.

Other registers

[Customer and user register of the HeadPower portal](#)

[HEAL data protection information](#)

[Welfare analyses](#)

[Persons register of the Kestävä keikkatyö \(ESF\) project](#)

[Portmate.eu data protection](#)