

## 1. Data Controller

### University of Eastern Finland

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**Joensuu Campus:** Yliopistokatu 2, P.O. Box 111, FI-80101 Joensuu, Finland

**Kuopio Campus:** Yliopistonranta 1, P.O. Box 1627, FI-70211 Kuopio, Finland

## 2. Representative of the Data Controller

Head of the Student and Learning Services Miia Turtiainen

## 3. Contact person of the Data Controller

Planner Outi Suorsa, email: [firstname.lastname@uef.fi](mailto:firstname.lastname@uef.fi), Tel. +358 50 375 2155

## 4. Contact information of the Data Protection Officer

Data Protection Officer Helena Eronen, Joensuu Campus, Aurora 3023, tel. +358294458187, tietosuoja@uef.fi

## 5. Purpose of the processing of personal data

The purpose of career monitoring surveys is to monitor the early career stages of university graduates and their situation in the labour market (five years for higher university degree graduates or discontinued bachelor's degree programme graduates, and three years for doctors) and utilise the monitoring information in research, highlighting the early career stages of people with an academic education, the development of higher education and student guidance, as well as for offering information for potential students, current students and graduates for planning their own studies and career. In the career monitoring survey, this information is produced and used without identification information about the participants. This information is university-specific, for cooperation between the universities, with cooperation partners.

## 6. Legal basis of the processing of personal data

The processing of personal data is based on the EU's General Data Protection Regulation (select at least one basis).

The EU's General Data Protection Regulation, Article 6, Section 1, sub-sections a–f.

- the data subject has given consent to the processing of his or her personal data
- processing is necessary for the performance of a contract (to which the data subject is party) contract:
- processing is necessary for compliance with a legal obligation to which the controller is subject

statutes:

- processing is necessary in order to protect the vital interests of the data subject or of another natural person
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
  - data pertaining to the person's status, duties or their performance
  - public authorities exercising their official mission in the general interest
  - scientific or historical research, or compilation of statistics
  - archiving of research and cultural heritage materials.
- exercising the interests of the controller or of a third party  
Please describe which interests:

As regards processing of special categories of personal data, the EU's General Data Protection Regulation, Article 9, Section 2, sub-section a–j:

- the data subject has given consent to the processing of his or her personal data
- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security
- processing is necessary to protect the vital interests of the data subject or of another natural person
- processing is carried out in the course of its legitimate activities by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim
- processing relates to personal data which are manifestly made public by the data subject
- processing is necessary for the establishment, exercise or defence of legal claims
- processing is necessary for reasons of substantial public interest
- processing is necessary for the purposes of occupational medicine
- processing is necessary for reasons of public interest in the area of public health
- processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

Legal grounds for processing: Duties in accordance with public interest (evaluation and development of university education (sections 2 and 87 of the Universities Act (2009/558)) and production of related statistics). Decree of the Ministry of Education and Culture on Calculation Criteria for University Core Funding (119/2019)

## 7. The categories of personal data to be processed and their retention periods

The register includes identifying and background information, which are gathered by CSC (IT Center for Science) and TUPA (Statistical Services of Tampere University). Following data will be recorded into the register:

1. Survey ID, timecode of electronical form
2. Identification data, which is used solely to manage target group, contacting them and gathering background information
3. First name, surname, finnish social security number, possible day of death
4. Postal address, postal code, telephone number
5. E-mail address (for communication about survey, will not be recorded with answers)
6. VIRT A student number
7. Gender, nationality, native language
8. Home municipality, postal code, moving out of Finland, day of the move, state
9. Degree level, scope of the degree, study municipality, study municipality's code, study subject/programme, faculty, department
10. University, year of selection, date of graduation, duration of being a registered student, duration of actual studies, field of science (levels 1,2,3), tuition fee, home municipality

Information identifying the respondent will only be used to send the survey and in order to link the above-mentioned background information. After that it will be destroyed. University of Eastern Finland stores data with non- direct identification information (surveyID, sex, year of birth, nationality, native language) for five years in order to compile time series. TUPA and CSC will store data without direct identification information for 10 years on commission of University of Eastern Finland.

## 8. Information systems used in the processing

The background and identification information of the group of respondents will be gathered in a centralised manner from the national VIRTAs study information service and, in supplementary parts, from the student information systems of universities (study subject, faculty). Address data will be supplemented using the Population Information System/Digi- ja viestintävirasto, and the telephone number will be acquired from a separate telephone number supplier (Suomen Asiakastietopalvelu Oy, Palvelutietokanta, Kuluttajatietokanta). Response data will be gathered from the answers of the participants. The participants have the opportunity to fill in a paper survey or an electronic online survey. Data from the paper surveys will be recorded in the electronic system as subcontracted by the controllers of sub-registers.

## 9. What is the source of personal data needed in the processing?

Based on subcontracting by the controllers of sub-registers, the register is processed by TUPA, statistical research service of the University of Tampere, and CSC - IT Center for Science Ltd.

CSC - IT Center for Science Ltd selects the target group, enriches the contact information, creates the survey links and collects the online answers, as well as combines the material for reporting. CSC processes direct personal data during data collection and the survey data without the direct data when reporting the results. CSC discloses the personal data (contact information, background information and survey IDs) to TUPA so the survey and reminders can be sent and for analysis of the data.

TUPA, statistical research service of the University of Tampere, coordinates the implementation of career monitoring and processes personal data in order to send the survey and for analysing and reporting purposes.

If the data subject consents to the processing of his or her personal data, the basis of giving access is:

- compliance with a legal obligation to which the controller is subject
- contract between the controller and the data subject

## 10. Use of cookies

Cookies are used browser-based information systems of personal data processing. A cookie is a small text file saved by the browser on the user's device. Cookies are used to implement services, to make it easier to log into services, and to enable the collection of statistics on service use.

The user may disable cookies, but this may prevent the system from functioning properly.

Cookies are used in the processing of personal data:

- Yes, in the following browser-based systems:
- No

## 11. Regular transfers and disclosures of data

TUPA discloses university-specific data to University of Eastern Finland, and to CSC for national reporting of national survey data. Data can be disclosed to partners (such as professional associations) for research purposes, excluding any personal data from which data subjects can be directly identified.

The data will be reported publicly so that no single individual can be identified from the results.

## 12. Transfer or disclosure of data outside the EU/EEA, and basis

No transfer outside EU/EEA.

## 13. Principles of protecting personal data

University of Eastern Finland stores data for five years. Data includes no direct personal data. Paperforms are stored in a personal working room in a locker with lock. Electronical data is stored at the planner's personal disk drive, two separate passwords required.

## 14. Automated decision-making

No automated decision-making.

## 15. Rights of the data subject

The data subject has the right to:

- Check his or her own data
- Ask for the rectification of his or her data
- Demand the erasure of his or her data
- Demand limited processing of his or her data
- Object to the processing of his or her data
- Request the transfer of his or her data from one controller to another
- Cancel previous consent, if the processing of personal data is based on the data subject's consent
- Not be subject to automated decision-making

To exercise his or her rights, the data subject can make a request via the university's e-Services (staff and students), via a form available on the university's website, or by contacting the university's Data Protection Officer.

The data subject has the right to file a complaint with the Office of the Data Protection Ombudsman, if he or she feels that existing data protection legislation has been violated in the processing of his or her personal data. Contact information:

Office of the Data Protection Ombudsman, P.O. Box 800, 00521 Helsinki  
[tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Guidance and instructions relating to the data subject's rights can be obtained from the university's Data Protection Officer:

University of Eastern Finland, P.O. Box 111, 80101 Joensuu  
[tietosuoja@uef.fi](mailto:tietosuoja@uef.fi), tel. +358 294458187, Joensuu, Aurora building, room 3023