

1. Data Controller

University of Eastern Finland

Joensuu Campus: Yliopistokatu 2, PL 111, 80101 Joensuu
Kuopio Campus: Yliopistonranta 1, PL 1627, 70211 Kuopio

Phone +358 29 445 1111 (switchboard)

2. Representatives of the Data Controller

Miia Turtiainen, Director of Student and Learning Services, and Tuija Pasanen, Head of Student Services

3. Contact person of the Data Controller

Tuija Pasanen, Head of Student Services, UEF Student and Learning Services, phone 029 445 8261.

4. Contact information of the Data Protection Officer

Helena Eronen, Data Protection Officer, General Administration and Legal Affairs, phone 029 445 8187,
tietosuoja@uef.fi.

5. Purpose of the processing of personal data

The purpose is to support smooth study for university students and promote their well-being through support measures within the Bridges Projects I and II funded by the Ministry of Education and Culture at the University of Eastern Finland in 2021-2023. The coordinating body of the project is the UEF Student and Learning Services. Bridges I includes 6 smaller subprojects, and Bridges II 4 subprojects. The UEF has signed an agreement on the distribution of the state grant with the Student Union of the University of Eastern Finland (ISYY) and the Student Union of the Savonia University of Applied Sciences (SAVOTTA) in Bridges I and II. The agreement with ISYY and SAVOTTA states that "The Parties undertake to treat confidential information as confidential, undertake not to disclose confidential information to third parties and undertake not to use confidential information for purposes other than the fulfillment of their rights and obligations under this Agreement. When agreeing on learning coaching activities with different learners in the Joensuu region, the instructions on "Processing and management of data" are attached to the agreement. According to this, the supplier of coaching activities complies with data protection legislation and other legislation applicable when processing confidential information. In addition to safety walks arranged by the UEF School of Applied Educational Science and Teacher Education, they develop the contents of the safety walk based on voluntary anonymous feedback collected after every walk. The feedback is used for internal development work only. In terms of study psychology activities, the processing of personal data is to support the students' abilities to study and

to improve the conditions for their study paths in the guidance and counselling interventions of a study psychologist. As for the Sykettä Sports Services subprojects (Joensuu and Kuopio), background information related to students' health and physical exercise will be processed.

6. Legal basis of the processing of personal data

The processing of personal data is based on the EU's General Data Protection Regulation (GDPR).

Detailed processing criteria of the Bridges Project:

- consent by the data subject
- implementation of a contract (in which the data subject is a party)
contract, please specify:
- compliance with the controller's legal obligation
statutes:
- vital interests of the data subject or another natural person
- task of public interest/exercise of the official public authority of the controller
 - data describing 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 data and cultural heritage materials
- exercising the interests of the controller or of a third party
describe which interests:

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

- consent by the data subject
- 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 health care
- 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

7. Categories of personal data to be processed and their retention periods

The data to be processed include the name, phone number, e-mail address, main subject and campus of the participant in the project. The data will be stored for a maximum period of about one year after the end of the project. In addition, the Student2Student peer guidance network collects information for the development of student well-being and guidance: main subject, year course, reason for participating and where the student has been guided to. In safety walks, gender, time and place of participation, as well as opinion responses are collected. In the implementation of part of the student union ISYY, it is possible that the participant in the action or the event is asked about gender and the language of contact. The data will be kept for a maximum of about one year. The Sykettä Sports Services subproject (Joensuu and Kuopio) will process background information related to students' health and physical exercise, details of which the participant fills out on the form. These forms will be destroyed within a certain period after the exercise counselling has ended. The privacy notices of Sykettä Sports Services are available at <https://sykettä.fi/joensuu/en/data-protection-records/> and

<https://sykettä.fi/kuopio/en/contact/data-protection-records/>. Study psychology activities follow the UEF guidelines on the processing of personal data available at <https://www.uef.fi/en/processing-of-personal-data>.

8. Information systems used in the processing

The information systems of the University of Eastern Finland (Peppi, Microsoft Forms) and the Student Union of the UEF (ISYY) and the Student Union Savotta (Savonia University of Applied Sciences) are used. In the study psychology activities, information is also retrieved from Peppi student and study register.

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

The personal data of the participants in the project (students etc.) are obtained from the participants themselves in connection with registrations. A person who does not disclose the required information may not participate in the project.

In study psychology activities the data will also be got from student register.

If the data subject provides his/her personal data for processing purposes, the basis for the provision of personal data is:

- statutory task of the controller
- agreement between the controller and the data subject

10. Use of cookies

Cookies are used in browser-based information systems for the processing of personal data. A cookie is a small text file that the browser stores on the user's device. Cookies are used to implement services, facilitate logging in to services and to enable the collection of statistics on service use. The users may disable cookies in their browsers, but this may prevent the system from working properly.

Cookies are used in the processing of personal data:

- Yes, the following browser-based systems: Webropol or similar, Peppi, Sykettä Sports Services
- No

11. Regular transfers and disclosures of data

The actors have access to Teams. Data shall be transferred from the sub-actors to the project coordination officer for reporting purposes. Feedback and results of safety walks will be transferred to the development of the UEF security organization. In study psychology activities, the data will not be transferred to the university's internal services nor outside the organisation unless the student requests it, or a legal obligation arises.

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

Personal data shall not be transferred outside the EU or the EEA

13. Principles for the protection of personal data

The information systems used in the processing of personal data are managed in accordance with the rules and guidelines of the University of Eastern Finland. Technically, the information systems and their interfaces are protected by a firewall, and the data of the systems is backed up regularly.

Access to information systems is limited through access groups so that each user has access only to the

information s/he needs in the course of his/her duties.

Persons employed by the university and in positions of trust are subject to professional secrecy in accordance with Section 23 of the Act on the Openness of Government Activities. In addition, university employees may not use or disclose the employer's professional or trade secrets during the employment relationship (Chapter 3, Section 4 of the Employment Contracts Act).

Confidential information, as well as storage periods, archiving and disposal, are defined in the university's archives formation plan.

14. Automated decision-making and profiling

Automated decisions or profiling are not made in the processing of personal data.

15. Rights of the data subject

- The basis for processing personal data is **the consent of the data subject**, in which case the data subject has the right to:
 - receive information about the processing of personal data
 - check his/her data
 - ask for the rectification of his/her data
 - demand the erasure of his/her data
 - demand limited processing of his/her data
 - request the transfer of his/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 (including profiling) without a legal basis

- The basis for processing personal data is the **implementation of a contract**, in which case the data subject has the right to:
 - receive information about the processing of personal data
 - check his/her data
 - ask for the rectification of his/her data
 - demand the erasure of his/her data
 - demand limited processing of his/her data
 - request the transfer of his/her data from one controller to another
 - not be subject to automated decision-making without a legal basis

- The basis for processing personal data is in compliance with the controller's **legal obligations**, in which case the data subject has the right to:
 - receive information about the processing of personal data, unless the act provides for a separate exemption
 - check his/her data
 - ask for the rectification of his/her data
 - demand limited processing of his/her data
 - not be subject to automated decision-making without a legal basis
 - this can be achieved by legislation laying down appropriate measures to protect the rights and freedoms and legitimate interests of data subjects

- The basis for processing personal data is based on **the vital interest** of the data subject or another person, in which case the data subject has the right to:
 - receive information about the processing of personal data
 - check his/her data
 - ask for the rectification of his/her data
 - demand the erasure of his/her data
 - demand limited processing of his/her data

- The basis for processing personal data shall be based on the performance or a task of **general interest or the exercise of public authority**, in which case the data subject has the right to:
 - receive information about the processing of personal data, unless the act provides for a separate exemption
 - check his/her data
 - ask for the rectification of his/her data
 - demand limited processing of his/her data
 - object to the processing of his/her data
 - not be subject to automated decision-making without a legal basis
 - this can be achieved by legislation laying down appropriate measures to protect the rights and freedoms and legitimate interests of data subjects

- The basis for processing personal data is **a legitimate interest** of the controller, in which case the data subject has the right to:
 - receive information about the processing of personal data
 - check his/her data
 - ask for the rectification of his/her data
 - demand the erasure of his/her data
 - demand limited processing of his/her data
 - object to the processing of his/her data

The controller shall notify each recipient to whom the personal data has been disclosed of any rectification, deletion or restriction of processing personal data.

To exercise his/her rights, the data subject may submit 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 s/he feels that existing data protection legislation has been violated in the processing of his/her personal data. Contact information:

Office of the Data Protection Ombudsman, P.O. Box 800, 00521 Helsinki, 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, phone +358 294458187.