

Privacy statement and information to the data subject (Articles 13 and 14 of General Data Protection Regulation (2016/679))

1. Name of privacy statement	Savonia In-Service Training
2. Controller	Name Savonia University of Applied Sciences Ltd.
	Address PL 6, 70201 Kuopio
	Other contact information (e.g. telephone at work, email address) savonia@savonia.fi
3. Contact person in matters concerning the register	Name Jenni Toivanen, Director of Continuous Learning jenni.toivanen@savonia.fi
	Telephone 044 785 6282
4. Data protection officer	Administrative Coordinator Mervi Hättinen, tietosuojavastaava@savonia.fi
5. Data subjects	Personal customers of continuous learning and in-service training, contact persons of customer and stakeholder groups, target groups of marketing and sale of education and services.
6. Legal basis for data processing	Processing of personal data is based primarily on the consent of data subjects, and for some education and trainings also on the Universities of Applied Sciences Act 932/2014 and the Universities of Applied Sciences Decree 1129/2014, the Archives Act and other legislation relating to these acts.
7. Purpose of personal data processing	The purpose of processing the data in the register is implementation of supplementary and commissioned education of Savonia University of Applied Sciences, maintenance of relations with customer and stakeholder groups, marketing and sale of educational and service products.
	The purpose of personal data processing pertaining to education is to maintain student records, and records of degrees and evaluations related to the participants. The register also contains data about potential development needs of the student and their assessment, information about practical training if included in studies, as well as applications and decisions regarding the student.
	Student achievement records are based on the register. Once in 24 hours, data is transferred from the register to the centralized Virta data warehouse.
8. Personal data contents and retention periods	The register contains:
	Personal customers: name, address, telephone, email, other necessary information relating to maintenance of customer relations.
	Persons participating in education and training - information about the student - information about the right to study - evaluation information - other potential documents pertaining to studies (incl. application forms) Contact persons: name, telephone, email company/stakeholder group.

	<p>Retention periods: Data pertaining to personal customers and contact persons are retained until the person requests their removal.</p> <p>Personal data stored in the student information system is anonymized one year after the student resigns or qualifies. Anonymization does not apply to such data, which the education institution is required to retain permanently.</p> <p>The data retention periods are based on the provisions of the Archives Act and data control plan based on it. The table below contains a few examples of data retention periods.</p> <table border="1" data-bbox="454 622 1532 907"> <tr> <td data-bbox="454 622 992 806">Student personal data (e.g. name, identity code, student identifier (OID), studies, attendance, registrations to implementations, completed courses with grades.</td> <td data-bbox="992 622 1532 806">Retained permanently</td> </tr> <tr> <td data-bbox="454 806 992 907">Information on which assessment is based.</td> <td data-bbox="992 806 1532 907">6 months from the end of study period.</td> </tr> </table>	Student personal data (e.g. name, identity code, student identifier (OID), studies, attendance, registrations to implementations, completed courses with grades.	Retained permanently	Information on which assessment is based.	6 months from the end of study period.
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<p>9. Regular sources of data</p>	<p>Customer register receives information from</p> <ul style="list-style-type: none"> - application and enrolment records (Lyyti or Event) - persons themselves, e.g. partnership agreements, signing for newsletter distribution (Positiividakko) - student information system - particulars of the student, information about the right to study, evaluation and achievements (Primus) - evaluation and achievement information (Wilma) - e-learning environment (Moodle, OpenEdu) 				
<p>10. Regular disclosure of data</p>	<p>Data transferred from the register</p> <ul style="list-style-type: none"> - Information about the student and completed courses to the Virta national warehouse for student information. - Basic information about the student to the library system used by Savonia University of Applied Sciences. <p>Data can be disclosed to a third party if a course is organised in cooperation with a partner (e.g. TE-Services, the party ordering the education).</p> <p>Data from the student information register can be disclosed for research purposes through the research consent procedure.</p> <p>Find below description of legitimate use of the national data warehouse of student information (Virta higher education student register).</p> <p>Data collected in the student information management system are public documents as defined in the Act on the Openness of Government Officials (621/1999), which are disclosed upon request. Public documents are disclosed upon request according to the provisions of Sections 13 and 16 of the Act on the Openness of Government Officials, and the Personal Data Act (523/1999).</p>				

	<p>Data regarding the right to study, registration, degrees and achieved credits are collected for centralized storage and processing to a national data warehouse, through which this content will be transferred as technical recording to the student admissions register and offered for use to the student admissions register services shared by all higher education institutions (Act 1058/1998, Section 1 a).</p> <p>The university discloses student information electronically via national data warehouse for higher education to the use of student admissions register (Act 1058/1998, Section 6 d).</p> <p>Based on data in the student admissions register of higher education institutions, The Ministry of Education and Culture produces data for evaluation, development, statistics and other monitoring and steering of education and research using the national data warehouse for higher education (Act 1058/1998, Section 6 d).</p> <p>The data warehouse can be used by the university also for other activities and when disclosing data to public officials and other higher education institutions (Act 1058/1998, Section 1 a).</p> <p>The university discloses information from its student information register to the Statistics Finland (Act on Statistics 280/2004, Section 15) as technical recording directly and via the national data warehouse for higher education.</p> <p>The university discloses data from its student information register to the Social Insurance Institution (Act on Student Financial Aid 21.1.1994/65) as technical recording directly and via the national data warehouse for higher education.</p> <p>The university discloses data from its student information register to the National Supervisory Authority for Welfare and Health Valvira (Act and Decree on Health Care Professionals A 559/1994, D 564/1994) as technical recording via the national data warehouse for higher education.</p> <p>The university discloses data from its register to the Finnish Student Health Service to enable statutory provision of the student health care services as technical recording via the national data warehouse for higher education.</p> <p>The university discloses data from its student information management register to the University Admissions Finland consortium via the national data warehouse for higher education using a technical connection for the purpose of fulfilling the statutory duties of higher education institutions.</p> <p>The university discloses data from its register for student follow-up surveys to be used for monitoring, statistics and research purposes (Personal Data Act, Sections 14 and 15).</p> <p>The university may disclose data from its register via the data warehouse for research purposes (Personal Data Act, Sections 14 and 15)".</p>
<p>11. Transfer of data outside the EU or EEA</p>	<p>Data is not transferred outside the EU or EEA.</p>

12. Principles for protection of the register	<p>A. Manual documentation After graduation, the student's diplomas and extracts from his or her study achievement register, for example, are printed out for archiving purposes. The prints in the archive are stored as described in the information management plan. Information on achievements that are being assessed are retained for half a year. Works returned by the student are in possession of the teacher. At the expiry of the retention period, the information is destroyed in an appropriate manner.</p> <p>B Computer-processed data Data in the student information management register is accessible by persons, whose role as an employee or student entitles them to do so. A student may update his or her personal data only. A student is identified by his or her username. Each staff member has been granted specific viewing and processing rights. Staff members are identified by their usernames.</p>
13. Rights of the data subject	<p>Under the EU's GDPR (2016/679) the data subject has the following rights:</p> <p>Right of access to their data The data subject has the right to receive from the controller confirmation on whether or not the personal data concerning them is processed. The data subject has the right of access to the data. A fee may be charged for the right of control. The data subject's request for control may be refused, if the requests are manifestly unfounded or unreasonable and especially if made repeatedly. (Articles 12 and 15)</p> <p>The right to rectification The data subject has the right to demand rectification of inaccurate personal data concerning them. (Article 16)</p> <p>The right to erasure With certain restrictions specified in the General Data Protection Regulation, the data subject has the right to have the controller erase the personal data concerning him or her. (Article 17)</p> <p>The right to restriction of processing With certain exceptions specified in the General Data Protection Regulation the data subject has the right to request the controller to restrict the processing of personal data concerning him or her. (Article 18)</p> <p>The right to data portability The data subject has the right to receive the personal data that he or she has provided to a controller in a machine-readable format, when the processing is based on consent and is automated. (Article 20)</p>
14. Automated decision making	<p>The data subjects of the register are not subjected to automated decisions.</p>