

PRIVACY STATEMENT Personal Customer Register

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

1. Name of privacy statement	Personal Customer Register
2. Controller	Name Savonia University of Applied Sciences Ltd. / VireTori Business Services Savonia University of Applied Sciences / Training school Educational responsibility in the fields of social welfare and health care and culture Address PL 6, 70201 Kuopio Other contact information (e.g. work telephone, email address) savonia@savonia.fi
3. Contact person in matters concerning the register	Name Viretori Coordinator Anna Voipio anna.voipio@savonia.fi Training School Anna-Maria Pekkinen anna-maria.pekkinen@savonia.fi
4. Data protection officer	Administrative Coordinator Mervi Hätinen, tietosuojavastaava@savonia.fi
5. Data subjects	Personal customers of VireTori and Practice School learning environments
6. Legal basis for data processing	Consent of data subject. Services produced by Savonia University of Applied Sciences are voluntary for the customers.
7. Purpose of personal data processing	Savonia University of Applied Sciences processes data of personal customers for the purpose of providing service to the customers. The services are provided by students in different educational fields of Savonia under supervision of educators. Personal data of personal customers is collected for customer management purposes.
8. Personal data content and retention periods of the register	The following personal data is collected from personal customers for customer management purposes: Name Address Telephone number Email address Personal identity code When necessary, health-related information is collected from customers receiving services from the VireTori learning environment: Diagnosis/es Health-related readings, such as blood pressure for example Condition of the customer on each visit In addition, some of the services include making a video of the customer, for example tests measuring the functional ability and motor skills of thecustomer, as well as videoing customer training programmes using thecustomer's telephone



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	For use of the Training School learning environment, the following data are collected: Background information on the customer's hobbies and Contact details of custodians of a customer under 18
	Videoing takes place with consent of the customer. The retention period of videos is 3 years from the date of recording of the first video. At training school the videos are for pedagogical purposes only.
	The retention period of data collected from personal customers is two years from the last customer event.
9. Regular sources of data	In VireTori learning environment personal data is collected with customer consent in connection with a service request.
	In Training School learning environment customer data is collected in connection with registration.
10. Regular disclosure of data	Savonia University of Applied Sciences does not disclose personal customer data to third parties without an explicit written consent of the customer. With consent of the customer, data may be disclosed to the family members of the customer and/or health care professionals (Viretori).
11. Transfer of data outside the EU or EEA	Data is not transferred outside the EU or EEA.
12. Principles for	A Manual documentation
protection of the	Viretori
register	ersonal data collected from service requests received by phone and via VireTori website are recorded manually on a service request form. The forms that have been filled are stored in VireTori service point in a locked cabinet during the customer relationship period and for two years after termination of the customer relationship. Then the service request forms are destroyed in an appropriate manner.
	Training School No manual documentation in practice school.
	B Computer-processed data
	Viretori Every student has personal user identifiers for systems used in VireTori. The user identifiers will be repealed automatically when the student's right of access to VireTori's customer data expires. If VireTori's personal customer data is transferred by email within the Savonia University of Applied Sciences, the email is secured.
	Training School Registration to the Training School is made via website. Information about persons who have registered themselves to the practice school is transferred to teachers by email via the university's intranet. If the customer takes a proficiency test (studies at Open UAS), the data is transferred electronically to the student information register. Attainment data of profi-



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13. Rights of data subject

Under the EU's GDPR (2016/679) the data subject has the following rights:

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)

The right to rectification

The data subject has the right to demand rectification of inaccurate personal data concerning them. (Article 16)

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)

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)

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)

14. Automated decision-making

The data subjects of the register are not subjected to automated decisions