

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

<b>1. Name of privacy statement</b>	<b>Electronic Driving Log and Tracking of Vehicles</b>
<b>2. Controller</b>	Name Savonia University of Applied Sciences Ltd
	Address PL 6, 70201 Kuopio
	Other contact information (e.g. work telephone, email address) savonia@savonia.fi
<b>3. Contact person in matters concerning the register</b>	Name Seppo Lyyra, Chief Financial Officer <a href="mailto:seppo.lyyra@savonia.fi">seppo.lyyra@savonia.fi</a>
	Telephone 044 785 5028
<b>4. Data protection officer</b>	Administrative Coordinator Mervi Hätinén, tietosuojavastaava@savonia.fi
<b>5. Data subjects</b>	Persons using Savonia's cars
<b>6. Legal basis for data processing</b>	Data about the use of vehicles by employees are collected to the register. The data is used as a basis for remuneration of costs relating to the use of vehicles in the performance of duties.  Data in the register may be used to compile reports from which an individual person in the register cannot be identified. The data can also be processed for the purpose of developing Savonia's activities, statistical purposes, and for internal auditing.  The vehicles are equipped with a tracking device.
<b>7. Purpose of personal data processing</b>	The purpose of personal data processing is to collect information about the use of Savonia's vehicles with the help of electronic driving log and tracking of vehicles. The register is in use in vehicles operated by Savonia's employees producing data in the form of electronic driving log.
<b>8. Personal data content and retention periods of the register</b>	The register may contain the following information: <ul style="list-style-type: none"> <li>• GPS device identifier</li> <li>• name of person reserving the vehicle</li> <li>• person's email address</li> <li>• number plate of vehicle</li> <li>• location tracking data (location, route and time)</li> <li>• driving speed</li> </ul> <p>The register does not contain any other personal data about the vehicle user except those recorded to the register by the person themselves.</p> <p>Information about controllers of the register:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• username</li> <li>• password</li> </ul>

	<p>The data is retained in the register for two (2) years of the end of the calendar year in which the entitlement for remuneration arose (Working Hours Act (605/1996, Section 38) and/or 6 years after the end of the year (Accounting Act (1336/1997) Chapter 2, Section 10, Subsection 2) during which the financial year ended.</p> <p>The data subject should take into account that if applicable legislation or contracts concluded with third parties binding Savonia require longer retention periods, the retention period of his or her personal data may have to be extended beyond that.</p>
<b>9. Regular sources of data</b>	<p>The basic data of the register is collected and maintained manually by persons who have user rights for the register.</p> <p>Vehicle tracking information is relayed by vehicle trip computer through a gsm subscription (separate car-specific tracking device). The data are automatically transferred to the register. The location data of the vehicle are collected by a tracking device installed in the vehicle.</p>
<b>10. Regular disclosure of data</b>	<p>Savonia does not transfer personal data collected by vehicle tracking to its collaboration partners and subcontractors unless the collaboration partners and subcontractors are engaged in duties related to handling or maintaining the electronic driving logs on Savonia's behalf only. Savonia always ensures that the collaboration partners do not process the transferred personal data for any other purposes.</p> <p>On separate request, data from the register may be disclosed to the authorities and police, but only to an extent it is necessary for the performance of monitoring or other duties based on the law.</p>
<b>11. Transfer of data outside the EU or EEA</b>	<p>Data is not transferred outside the EU or EEA.</p>
<b>12. Principles for protection of the register</b>	<p>A Manual documentation</p> <p>None.</p> <p>B Computer-processed data</p> <p>Personal data processing is confidential.</p> <p>Basic information is gathered and processed in the register by persons with user rights to the register. Tracking data from the vehicle trip computer is relayed through the gsm subscription and automatically stored in the register. Location data is collected by a tracking device fitted to the vehicle and relayed to the driving log. Employees were notified of deployment of tracking devices during the employee co-operation negotiations on 19 April 2018.</p> <p>Data in the register is protected by username and password.</p> <p>Changes in user rights are recorded in the log data of the register, and the service provider knows who has the right to access the data. All entries are recorded in the log.</p> <p>The register is upheld by the service provider. It is located in the service provider's servers in Finland. The service provider does not have access to information regarding drivers of the vehicles or Savonia's personnel except for persons who feed data into the register. The service provider cannot link persons to vehicles.</p>

<b>13. Rights of data subject</b>	<p>Under the EU's GDPR (2016/679) the data subject has the following rights:</p> <p><b>Right of access to their data</b>                  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><b>The right to rectification</b>                  The data subject has the right to demand rectification of inaccurate personal data concerning them. (Article 16)</p> <p><b>The right to erasure</b>                  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><b>The right to restriction of processing</b>                  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><b>The right to data portability</b>                  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>
<b>14. Automated decision-making</b>	The data subjects of the register are not subjected to automated decisions