

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

1. Name of privacy statement	Learning Management Systems
2. Controller	Name Savonia University of Applied Sciences Ltd.
	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 Seppo Räsänen, Digital Pedagogy Specialist +358447856581
4. Data protection officer	Administrative Coordinator Mervi Hätinen, tietosuojavastaava@savonia.fi
5. Data subjects	Students and staff of Savonia University of Applied Sciences
6. Legal basis for data processing	The processing of personal data in the register is partly based on consent and partly on a statutory obligation. When the legal basis for the controller's processing of personal data is a statutory obligation, the controller's activities are guided by the Polytechnics Act 932/2014 and the Government Decree on Polytechnics 1129/2014, as well as the Act on the Openness of Government Activities (621/1999).
7. Purpose of personal data processing	Degree-oriented and continuous learning (e.g., open university of applied sciences, business training, etc.) is implemented through both classroom and online study. Online study utilizes multiple digital learning environments. Digital learning environments may vary by field of study and by implementation.
8. Personal data content and retention periods of the register	Below is a list of the digital learning environment solutions that are used in Savonia during online studies. For each system, the most important personal data groups that are processed in that environment are described.
- og.oto.	For some systems, there are also links to the privacy statements of each service provider according to which they operate. Savonia supplies these systems with the information described below, but Savonia cannot, for example, delete data, as the system is not maintained by Savonia. For these systems, requests related to data protection should be sent to the service address described by the service provider.
	 Personal information: name, e-mail, learning tasks returned by students, evaluations of learning tasks. The Moodle user can add country, town, description, photo and phone number. On the basis of the user's activity, log information is created, including the time, the person's name, the action performed by the person and the user's IP information. Data storage period: the person's data is stored for the duration of the studies and after graduation for another six months. The minimum storage period for evaluations of learning tasks is six months. When the user's username expires, the user can no longer access the data in question.

Selection course Moodle

- Personal information: name, e-mail, learning tasks returned by students, evaluations of learning tasks. The Moodle user can add country, town, description, photo and phone number.
- On the basis of the user's activity, log information is created, including the time, the person's name, the action performed by the person and the user's IP information.
- Data retention period: the data of persons participating in selection courses is stored for five years. When the user's username expires, the user can no longer access the data in question.

Edunia Moodle

- Personal information: name, e-mail, learning tasks returned by students, evaluations of learning tasks. The Moodle user can add country, town, description, photo and phone number.
- On the basis of the user's activity, log information is created, including the time, the person's name, the action performed by the person and the user's IP information.
- Data storage period: the data of participants in continuous learning trainings is stored for six months after graduation. When the validity period of the user's username expires, the user can no longer access the data in question.

Möbius Grading

- Savonia gives the person's name to Möbius. The system stores the learning assignments returned by the students and the related evaluations. The evaluation data is uploaded to Savonia's Moodle.
- The Privacy Statement of the Möbius service provider can be found at https://www.digitaled.com/terms-and-privacy/.

LinkedIn

- Savonia hands over the person's e-mail. The system stores the information of completed courses.
- The LinkedIn service provider's Privacy Policy can be found at https://www.linkedin.com/legal/privacy-policy.

Matlab Grader

- Savonia will hand over the person's name and email. The system stores the information of completed learning tasks.
- The Matlab service provider's Privacy Statement can be found at https://www.math-works.com/company/aboutus/policies statements/privacy-policy.html.

Zoom video conferencing system

- Savonia will hand over the person's name and email (registered users). During the
 meeting, the IP address and system data are stored in Zoom. The name given by
 the user, the IP address during the meeting and the system information are stored
 for the unregistered user.
- Some of the training and information sessions are recorded and made available to staff and/or students on the Savonia Intranet. The recording may include the person's image, voice and name.
- For electronically monitored exams, the participant's identity is checked individually in the breakout room. The exam and identification status are not recorded.
- Zoom recordings are stored on the Zoom server for a maximum of 14 days.
- The Privacy Statement of the Zoom service provider can be found at https://explore.zoom.us/en/privacy/?ga=2.226693597.1915786622.1711634605-2133988078.1630915475.

Exam electronic exam system

- Personal information: name, e-mail address, staff identification number, student number, student's ESI identifier, student's PeppiID, user ID, home organization.
- Information related to exams: exam reservation, exam performance returned by the student, exam feedback given by the teacher and exam grade.
- Data retention periods: the data of exam participants can be deleted upon request, taking into account the retention periods of the data subject to evaluation.

Planet eStream media server

- Savonia will hand over the person's name and email. The user saves media content, e.g. videos, to be published in the system. When recording, the user can specify access rights and media visibility time.
- Data retention periods: user and administrator can delete media files if desired. If the media content is the subject of the evaluation of the study course, then the storage periods related to the deletion of the files are taken into account.

Turnitin and Turnitin Similarity - plagiarism checker

- Savonia transfers the student's personal data from Savonia's Moodle to Turnitime
 when a profile is created for the user. A profile is created when a person returns the
 first task to be checked to Turntime.
- Savonia transfers the information of the person in the teacher role in Moodle to Turnit when the teacher prepares a Turnit activity for his Moodle course for the first time.
- When a student returns a learning assignment to Turnit's activity in Moodle, then
 the file in question is transferred to Turnit. The work returned to Turnitime may include assessment data, which is saved when the teacher makes the assessment.

Savonia blog

- Savonia hands over the person's name and e-mail address to Savonia's own Wordpress service.
- The user saves his blog posts in the system. Comments can be added to the blog post if the blog author allows it.
- Data retention periods: blog posts can be deleted if necessary, taking into account the retention periods of the data subject to evaluation.

Microsoft M365

- Savonia hands over the name and email address to the M365 service.
- The user saves the files they want in the environment, e.g. Office files and Stream videos.
- Data retention periods: the user can delete their own files from the M365 environment at any time. When the Savonia campus ID stops working, e.g. after graduation, the user's data can no longer be used.
- Microsoft Privacy Statement https://www.microsoft.com/en-gb/privacy/privacy/privacy/state-ment

Teams (Included in Microsoft 365)

- Savonia hands over the users name, email address, messages and conversations, files and attachments, meeting recordings, Stream service and transcripts (unless the meeting organizer has prevented this).
- Some of the training and information sessions are recorded and made available to staff and/or students on the Savonia Intranet. The recording may include the person's image, voice and name.
- Teams Privacy https://www.microsoft.com/en-us/microsoft-teams/secu-rity#tabxb5fa59764b9c415a975ba5a1a81d91a1



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	 Webropol Savonia hands over the name and e-mail to Webropol. The user saves the queries he creates in the environment. Data retention periods: the user can delete their own surveys in Webropol at any time. The administrator can delete user-created queries with their data when requested.
9. Regular sources of data	Digital learning environments are logged in with the Savonia campus ID. The data source is Savonia's user management system. Some information can also be obtained from the registrant himself or herself.
10. Use of cookies	Cookies are used in browser-based information systems for processing personal data. A cookie is a text file that the browser saves on the user's device. Cookies are used to implement services that facilitate, for example, logging into the services and enable statistics on the use of the services. The user can prevent the use of cookies, but this can limit the use of the service.
11. Regular disclosure of data	Personal information from digital learning environments is not transferred to other systems.
12. Transfer of data outside the EU or EEA	Data is not transferred outside the EU or EEA.
13. Principles for protection of the register	A Manual documentation Digital learning environments do not become manual information sources.
	B Computer-processed data Savonia University of Applied Sciences is committed to processing personal data in a confidential and secure manner. Only those persons who have the right to process the personal data in question for their work are entitled to use the system containing personal data. Each user has their own username and password for the system.
	Databases containing personal data are protected by firewalls, passwords and other technical means. The databases and their backups are located in locked rooms and only certain pre-designated persons can access the data.
14. Rights of data subject	For questions related to the rights of the registered person, you can contact the contact person of the register or the data protection officer.
	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. There is no right to deletion if we process your personal data to comply with a legal obligation or if the processing of your personal data takes place for the performance of a task in the public interest or for the exercise of public authority belonging to University of Applied Sciences. (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)

The right to object

The registered person has the right to object, on grounds related to his personal special situation, to the processing of his personal data, which is based on the processing is necessary for the performance of a task in the public interest or for the exercise of public authority belonging to the controller. The controller may no longer process personal data, except if the controller can demonstrate that there is a significantly important and justified reason for the processing that overrides the interests, rights and freedoms of the data subject, or if it is necessary to prepare, present or defend a legal claim. (Article 21)

The right to withdraw consent

If the processing of personal data is based on the consent given by the registered person, the registered person has the right to withdraw the consent given to the processing at any time without affecting the legality of the processing carried out on the basis of the consent before this. (Article 7)

The right to appeal

The registered person has the right to file a complaint with the Office of the Data Protection Ombudsman, if one considers that valid data protection legislation has been violated in the processing of his personal data.

15. Automated decision-making

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