

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’s Customer Register – Savonian CRM
2. Controller	Name Savonia University of Applied Sciences Ltd.
	Address PL 6, 70201 Kuopio
	Other contact information (e.g. work telephone, email address) savonia(at)savonia.fi (Registry)
3. Contact person in matters concerning the register	Name Kaija Sääski Telephone 044 785 6922 kaija.saaski(at)Savonia.fi
4. Data protection officer	Administrative Coordinator Mervi Hätinén, tietosuojaavastaava(at)savonia.fi
5. Data subjects	Savonia's leads, customers, partners, and stakeholders' contacts, as well as personal customers and alumni in the marketing and sales of education and service products.
6. Legal basis for data processing	<p>The legal bases for the processing of personal data are the following, in accordance with the EU General Data Protection Regulation (hereinafter also referred to as the “GDPR”):</p> <ul style="list-style-type: none"> a) the data subject has given consent to the processing of their personal data for one or more specific purposes (GDPR Article 6(1)(a)); b) the processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract (GDPR Article 6(1)(b)); c) the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (GDPR Article 6(1)(e)); d) the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (GDPR Article 6(1)(f)). <p>The above-mentioned task carried out in the public interest is based on the statutory obligation laid down in the Universities of Applied Sciences Act (932/2014) to cooperate with the surrounding society and operating environment (Section 5).</p> <p>The above-mentioned legitimate interest of the controller is based on a relevant and appropriate relationship between the data subject and the controller, arising from the fact that the data subject is a customer of the controller, and where the processing takes place for purposes that the data subject may reasonably expect at the time of collection of the personal data and within the context of the appropriate relationship. The controller’s legitimate interest may allow the processing of personal data for direct marketing, scientific research, and statistical purposes.</p>
7. Purpose of personal data processing	The purpose of the register is to manage Savonia University of Applied Sciences' lead, customer, partnership, alumni and stakeholder relationships, and to market and sell educational and service products.

<p>8. Personal data content and retention periods of the register</p>	<p>The customer register includes:</p> <ul style="list-style-type: none"> • Alumni information (alumni register): Personal identification number, name, address, telephone, email, student number, degree program, degree, graduation date <ul style="list-style-type: none"> ○ consent and legitimate interest • Individual customers: Name, address, telephone, email, information related to customer management <ul style="list-style-type: none"> ○ consent and agreement • Contact person information: Name, telephone, email, company/stakeholder group <ul style="list-style-type: none"> ○ agreement, public interest and legitimate interest <p>Retention periods:</p> <ul style="list-style-type: none"> • Alumni data is retained until the individual requests deletion of their data. • Personal customer and contact data is retained for two years from the last sales or marketing event.
<p>9. Regular sources of data</p>	<p>Customer register receives information from</p> <ul style="list-style-type: none"> • persons themselves, e.g. from partnership agreements, • information about those registered for training from the student information management system or the commissioning company, • information about alumni from the person themselves, public sources and registers.
<p>10. Regular disclosure of data</p>	<p>Data is not disclosed.</p>
<p>11. Transfer of data outside the EU or EEA</p>	<p>Data is not transferred outside the EU or EEA by Savonia.</p>
<p>12. Principles for protection of the register</p>	<p>A Manual documentation</p> <p>There is no manual documentation.</p> <p>B Computer-processed data</p> <p>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.</p> <p>Databases containing personal data are protected by firewalls, passwords and other technical means. The databases and their backups are located in the Microsoft cloud service and only certain pre-designated persons can access the data.</p>
<p>13. Rights of data subject</p>	<p>For questions related to the rights of the registered person, you can contact the contact person of the register or the data protection officer.</p> <p>Under the EU's GDPR (2016/679) the data subject has the following rights:</p> <p>Right of access to their data</p> <p>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. 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)</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> <p>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)</p> <p>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)</p> <p>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. https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman (in english) https://tietosuoja.fi/ilmoitus-tietosuojavaltuutetulle (in finnish)</p>
<p>14. Automated decision-making</p>	<p>The data subjects of the register are not subjected to automated decisions</p>