



1. Data controller

University of Lapland, business ID: 0292800-5
P.O. Box 122
96101 Rovaniemi, Finland

2. Controller's representative and contact persons

Controller's representative:

Vice Rector Piia Björn
piia.bjorn@ulapland.fi

Controller's contact person

Education Manager Niina Romakkaniemi
niina.romakkaniemi@ulapland.fi

Coordinator Minna Ankerman
minna.ankerman@ulapland.fi

Education Manager Annika Tuomisto
annika.tuomisto@ulapland.fi

Executive Assistant Henna-Leena Mäntylä
henna.mantyla@ulapland.fi

The contact persons can be contacted for any questions related to the processing of personal data. You may also address any request concerning the exercise of your rights to the contact person mentioned above.

3. Contact details of the Data Protection Officer

The Data Protection Officer of the Lapland University Consortium is lawyer Jari Rantala. You can contact him at tietosuoja@ulapland.fi.

4. Purpose of processing personal data

The customer and stakeholder data collected in the MS Dynamics customer register is used in the University of Lapland's stakeholder activities and marketing. The basis for registration is a customer or cooperation relationship with the University of Lapland or the use of services provided by the University of Lapland.

The information contained in the register is used by the University of Lapland:

- Marketing of continuing education and other training and development services
- Communication between alumni and the University of Lapland
- Contacts with research projects and networks
- Information and marketing of University events, services and trainings
- Information and marketing related to development cooperation
- Communicating invitations to guest events

5. Legal basis for processing

Personal data are processed in compliance with the Article 6(1) of the General Data Protection Regulation (GDPR 2016/679):

- ☒ participant's consent
- ☒ legitimate interests pursued by the controller or by a third party
which legitimate interest in question: a meaningful and appropriate relationship, similar to a client relationship, is established between the registrant (alumni or invited guest) and the university as a result of graduation or participation in a stakeholder event

6. Categories of personal data processed and their retention periods

Data is collected from data subjects when they register for the events. This data includes:

- name
- address
- e-mail address
- consent to the processing of personal data

In addition, it's possible to save:

- phone number
- professional or specialist sector, if any
- gender
- customer or stakeholder information
- the data subject's stakeholder history (e.g. contacts with / from the customer)
- name of the background organisation of the data subject
- position or function in the organisation
- address of the background organisation
- sector of activity and service sector of the background organisation

For University of Lapland alumni, the register also contains:

- date of birth
- University of Lapland degrees obtained at the University of Lapland
- the year of commencement and graduation
- faculty, degree programme, major subject and degree programme during studies

However, only the information necessary for the client group concerned is always recorded. The customer can use the electronic form to remove himself from the register or request the removal of his data by contacting the contact person. The data will be kept in the register until the customer requests otherwise.

7. Data sources

The data to be stored is obtained from:

- on the basis of a self-declaration by the data subject from the newsletter subscription or training enrolment form
- for invited guests to University of Lapland stakeholder and community events on the basis of registrations or on the basis of the registrant's own notification (request, e.g. by e-mail).
- for alumni, from the University of Lapland's student information system on the basis of a data release authorisation or on the basis of the data subject's own notification via the electronic entry form in the alumni register
- for alumni address data, using the address data of the Population Register, if necessary

Additional information or clarifications to data already provided may also be stored if communicated by e-mail, telephone or at a meeting. There are no sanctions for failure to provide information.

8. Safeguards to protect personal data

Any manual material relating to the register is stored securely in locked premises with access control. The electronically processed data is protected by software, including secure communication channels, firewalls and similar technical solutions. Access to the register is limited to users who have been specifically authorised to access the register and who need access to personal data for marketing or stakeholder cooperation purposes. Access rights are managed by the University of Lapland.

9. Information systems used for processing

9.1 Information systems

Personal data is processed in the O365-based MS Dynamics system and the integrated ClickDimensions system (email marketing software).

9.2 Cookies

Cookies are used in browser-based information systems for the processing of personal data. A cookie is a small text file that is saved by the browser on the user's device. Cookies are used to provide services, to facilitate logging in to services and to enable statistics on the use of services. The user can choose to refuse the use of cookies in their system, but this may hinder the correct functioning of the system.

10. Regular transfers and disclosures of data

Information may be disclosed to designated third parties only if required for the implementation of the event, such as financial transactions, accommodation, catering and transport services.

The name and contact details (e-mail address) of individuals may be shared in the form of an attendee list at the event for networking purposes of the event visitors.

11. Transfer or disclosure of personal data to countries outside the EU/European Economic Area

No personal data will be transferred or disclosure outside of the areas of the European Union or the European Economic Area.

12. Automated decisions

No automated decisions are made.

13. Your rights as a data subject, and exceptions to these rights

The contact person in matters concerning the rights of the data subject mentioned in section 1 of this privacy notice.

Rights of data subjects

Right to withdraw your consent (GDPR, art. 7)

You have the right to withdraw your consent if the processing of your personal data is based on consent. Withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

Right of Access (GDPR, art. 15)

You have the right to know whether and what personal data about you is being processed. You may also request a copy of the personal data processed, if you wish.

Right to Rectification (GDPR, art. 16)

If there are inaccuracies or errors in the personal data processed, you have the right to request their correction or completion.

Right to Erasure (GDPR, art. 17)

You have the right to request the erasure of your personal data in the following cases:

- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) you withdraw the consent on which the processing is based and where there is no other legal ground for the processing;
- (c) you object to the processing (see below for a description of this right) and there are no overriding legitimate grounds for the processing;
- (d) the personal data have been unlawfully processed; or
- (e) the personal data have to be erased for compliance with a legal obligation under Union or Member State law to which the controller is subject.

However, there is no right to erasure if, in certain individual cases, the erasure of data is not allowed on the reasons defined in the General Data Protection Regulation or Finnish data protection legislation.

Right to Restrict Processing (GDPR, art. 18)

You have the right to restrict the processing of your personal data in any of the following circumstances:

- (a) you contest the accuracy of the personal data, in which case the processing shall be limited for a period of time within which the University of Lapland can verify the accuracy of the personal data;
- (b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;

- (c) the University of Lapland no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims
- (d) you have objected to the processing of personal data (see below for more details), pending verification of whether the controller's legitimate grounds override those of the data subject.

Right to Data Portability (GDPR, art. 20)

You have the right to receive the personal data you have provided to the University of Lapland in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without the University of Lapland's hindrance, where the legal basis for the processing is consent or a contract, and the processing is carried out automatically. If you use your right to transfer data portability, you have the right to have the personal data transferred directly from one controller to another, where technically possible.

Right to Object (GDPR, art. 21)

You have the right to object the processing of your personal data if the processing is based on a public interest or a legitimate interest. In this case, the University of Lapland may not process your personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or where it is necessary for the establishment, exercise or defense of legal claims. The University of Lapland may also continue to process your personal data where it is necessary for the performance of a task carried out in the public interest.

Exceptions to rights

The rights described in this paragraph may be derogated from in certain individual cases on the grounds defined in the General Data Protection Regulation and the Finnish Privacy Legislation. The need to derogate from the rights will always be assessed on a case-by-case basis.

Right to lodge a complaint

You have the right to submit lodge a complaint with the Data Protection Ombudsman's Office if you think your rights have been breached.

Contact details:

Data Protection Ombudsman's Office (Tietosuojavaltuutetun toimisto)

Link: [Notification to the Data Protection Ombudsman](#)

Visiting address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: P.O. Box 800, 00531 Helsinki, Finland

E-mail: tietosuoja(at)om.fi

Switchboard: +358 (0)29 566 6700

Registry: +358 (0)29 566 6768

THIS FORM MUST ALSO BE COMPLETED AND SUBMITTED TO THE REGISTRY.
(kirjaamo@ulapland.fi)