

# Ministry of Education and Culture Privacy Policy for Data Subjects

Personal data processed in the collection of recruitment data at higher education institutions

### 1 General

This Privacy Policy contains information for the data subject that is in accordance with Articles 13 and 14 of the EU General Data Protection Regulation (EU) 679/2016 (for natural persons). This Policy shall be issued to the data subject when personal data is collected.

#### 2 Data controller and contact details

Ministry of Education and Culture

Registry visiting address: Ritarikatu 2 b, Helsinki

Postal address: P.O. Box 29 FIN-00023 GOVERNMENT

Email: kirjaamo.okm@gov.fi

Tel. +358 295 16001 (Government switchboard)

### 3 Data protection officer contact details

The Data Protection Officer of the Ministry of Education and Culture

Email: okmtietosuojavastaava@gov.fi

Postal address: Ministry of Education and Culture, P.O. Box 29 FIN-00023

**GOVERNMENT** 

## 4 The purpose of processing personal data

The recruitment data collection of higher education institutions collects information on the staff recruited by higher education institutions and the attractiveness of higher education institutions. The data collection is part of the annual statistics collected from higher education institutions by the Ministry of Education and Culture, see <a href="https://wiki.eduuni.fi/display/cscsuorat/Suorat+tiedonkeruut">https://wiki.eduuni.fi/display/cscsuorat/Suorat+tiedonkeruut</a> (in Finnish).

Data collection is based on section 51 of the Universities Act and section 45 of the Universities of Applied Sciences Act, under which higher education institutions are obliged to submit to the Ministry of Education and Culture the information required for the evaluation, development, statistics and other monitoring and steering of education and research.

The aim of the recruitment data collection is to create a statistical knowledge base that helps the Ministry of Education and Culture to steer higher education institutions and that would enable higher education institutions to improve their own activities and achieve the objectives agreed with the Ministry of Education and Culture. The purpose of collecting data is not to interfere with the recruitment processes of individual higher education institutions, nor to monitor individuals based on the data collected. Individuals cannot be identified from statistical reports compiled on the basis of the data.

### 5 Criteria for processing personal data

The basis for processing data originates from the statutory task of the Ministry of Education and Culture to steer the higher education system, which has been stated, for example, in the Decree on the Rules of Procedure of the Ministry of Education and Culture (359/2014), under section 11(3) which states: "The task of the Department for Higher Education and Science Policy is also to ensure the general preconditions for education and scientific research in its field, education planning and predicting education needs, taking into account the needs of working life". This is supported by section 51 of the Universities Act and section 45 of the Universities of Applied Sciences Act, according to which the University of Applied Sciences must provide the Ministry of Education and Culture with the data it has requested for the evaluation, development, statistics and other monitoring and steering of education and research in a manner determined by the Ministry.

# 6 Categories of data subjects and categories of personal data to be processed

Recruitment data collection concerns the recruitments for university researcher's career stages II-IV and teaching staff and RDI staff at universities of applied sciences. The

collected information is information related to the application, the basic information of the person selected for the position, and the information collected through surveys about the previous work of the person selected for the position. The information to be collected is specified in more detail on pages

https://wiki.eduuni.fi/display/cscsuorat/4.2.8+YO+Rekrytointitiedonkeruu+2022 and https://wiki.eduuni.fi/display/cscsuorat/4.1.6+AMK+Rekrytointitiedonkeruu+2022 (in Finnish).

## 7 Sources of personal data when not obtained from the individual

The information is based on the recruitment systems of higher education institutions, personal data systems and a separate survey. The higher education institution submits the information to the Ministry of Education and Culture.

## 8 Processors and recipients of personal data

The Ministry of Education and Culture has concluded an agreement with CSC - IT Center for Science Ltd. in which CSC acts as the processor of personal data included in the personal data file maintained by the Ministry of Education and Culture.

The data is not disclosed.

# 9 Transfer of personal data outside the EU or the EEA or to an international organisation

Personal data is not disclosed outside the EU or the EEA or to international organisations.

### 10 Storage periods for personal data

Statistical data is generated from the collected personal data. When the statistical data has been generated and the personal data is no longer needed, the personal data is deleted.

### 11 Rights of the data subject

The data subject has the right to obtain information from the controller as to whether their personal data is being processed.

The data subject also has the right to request:

- personal data concerning themselves
- that the controller rectify or erase incorrect or outdated data.
- restricting the processing of their personal data

If the data subject considers that the processing of their personal data is not lawful, the data subject has the right to lodge a complaint with the Data Protection Ombudsman.

### 12 Automatic decision-making and profiling

Personal data shall not be used for automated decision-making or profiling that would affect the rights or freedoms of data subjects.

### 13 Protection of personal data

In its capacity as the controller, the Ministry of Education and Culture has taken the necessary technical and organisational measures to ensure that the data is secure and also requires this of the processors of personal data.