

### Privacy statement for the data subject

This statement provides information required by EU's General Data Protection Regulation (articles 13 and 14).

<b>Name of the register:</b>	National career monitoring survey for graduates of universities of applied sciences
<b>Date:</b>	30.9.2020
<b>Controller, contact person and person in charge of the register</b>	<p>The controllers are universities of applied sciences. Each university of applied sciences acts as an independent controller.</p> <p>Information on contact persons and persons in charge of the register for each university of applied sciences is available <a href="#">here</a>.</p>
<b>Data protection officer and contact information</b>	<p>The information on each respective university of applied sciences is available here:  <a href="https://wiki.eduuni.fi/display/CscArvo/Tietosuojailmoitus">https://wiki.eduuni.fi/display/CscArvo/Tietosuojailmoitus</a></p>
<b>The purpose of maintaining the register and the lawful basis for processing personal data</b>	<p>The purpose of the career monitoring surveys is to monitor the working career and labour market situation of graduates from universities of applied sciences (alumni) and to benefit the information obtained from the monitoring in studies on the beginning of the working career, in the development of education and study guidance and counselling. In addition, based on the career monitoring surveys, information is provided to applicants, students and graduates for the planning of their studies and careers.</p> <p>In the career monitoring survey, information is produced and utilized separately by each university of applied sciences, in the cooperation between higher education institutions, with cooperation partners and in general for research purposes through the Finnish Social Science Data Archive. Information is reported only thus that individuals cannot be identified.</p> <p>Answers to the survey are requested from those who have completed a university of applied sciences degree five years ago. The responses will be collected with Arvo – Education Management Information Service, which is maintained and developed by CSC – IT Center for Science Ltd.</p> <p>The respondent's personal identification information (e.g., student ID, name, and address information) will only be used for submitting the survey and connecting it to the background information.</p> <p>The right of the university of applied sciences to process personal data as a controller is based on:</p>

	<ul style="list-style-type: none"> <li>the statutory obligation and the legitimate interest (Data Protection Regulation, article 6.1 c and f). Universities of applied sciences must assess their education and other activities as well as their impact. In addition, universities of applied sciences must engage in applied research, development, innovation, and artistic activities that serve the instruction in universities of applied sciences and promote regional development and development of the world of work, as well as renew the economic structure of the region. The survey responses will be processed as a part of this task.</li> <li>the performance of a task in the public interest (article 6.1 e of the GDPR and article 4 of the Data Protection Act). The processing of personal data is necessary for scientific research and statistics as well as for archiving purposes.</li> </ul> <p>Principal statutes</p> <ul style="list-style-type: none"> <li>Universities of Applied Sciences Act 932/2014 and the regulations laid down by virtue of it</li> <li>Government Decree on Universities of Applied Sciences 1129/2014 and its amendments</li> <li>Act on the National Registers of Education Records, Qualifications and Degrees 884/2017 (chapter 5)</li> <li>General Data Protection Regulation (EU) 2016/679 and its supplementing national regulations, such as the Data Protection Act 1050/2018</li> <li>Act on the Openness of Government Activities 621/1999</li> </ul>
<b>A: Personal data is collected directly from you</b>	Yes, with an electronic survey.
<b>B: Personal data is collected elsewhere than from you</b>	<p>The background and individual information of the group of respondents are extracted in a centralized manner from the national Higher Education Achievement Register VIRTa and in a complementary respect from the student information systems of universities of applied sciences.</p> <p>CSC is responsible for the extraction of the personal information saved in the register and for the acquisition of the necessary contact information.</p>
<b>Data content of the register (a description on the data subject groups and the personal data groups)</b>	<p>The individualized and background information of the target group of the career monitoring survey (group of respondents) is saved in the register:</p> <ul style="list-style-type: none"> <li>University of applied sciences</li> <li>Student code</li> <li>Last name</li> <li>First name(s)</li> <li>Gender</li> <li>Email address</li> <li>Telephone number</li> <li>Postal address and code</li> <li>Place of residence</li> <li>Place of domicile</li> </ul>

	<p>           Citizenship            Country            Mother tongue            Age at graduation            Field of education            Level of degree            Name and extent of degree            Year of selection            Year of graduation            Time of graduation            Municipality of study            Months as present student            Language of education            Type of education         </p> <p>           For those who respond to the career monitoring survey, the information in question will be supplemented by the information they have provided concerning placement in the world of work, factors related to the quality of employment and the respondent's satisfaction with their studies from the perspective of their career and the world of work. In addition, the respondent's log data will be recorded to verify the operation of CSC's service, to detect malicious queries and to investigate error events. In the log, following information will be recorded: a timestamp when the form is opened, a session identifier, and technical information on the terminal device used and the browser used (for example, the browser user agent).         </p> <p>           The register does not contain personal information belonging to special groups of persons.         </p> <p>           In addition to the responses given, the following background information will be returned to the respondent's own higher education institute: year of graduation, gender, age at graduation, mother tongue, code/field of study, field of study, major subject, level of degree, code/degree education, name of degree, extent, year of selection, code/place of residence, place of residence, time of graduation, code/municipality of study, place (city) of study, months as registered student, semesters as present, language of education and type of education.         </p>
<p><b>Recipients and recipient groups of personal data (=disclosures)</b></p>	<p>           In processing, analysing, and preparing reports, universities of applied sciences may use personal data processors, such as:         </p> <ul style="list-style-type: none"> <li>- CSC IT Center for Science Ltd, which in the role of personal data processor of the Arvo system collects and stores personal data on a server, investigates problem events, performs analyses and statistics on the data and delivers the data to the Finnish Social Science Data Archive.</li> <li>- Researchers or research institutes selected by universities of applied sciences, which, commissioned by universities of applied sciences, create analyses and reports based on the data.</li> <li>- The Finnish Social Science Data Archive for archiving responses concerning the results of those universities of applied sciences that have concluded an archiving agreement with the Finnish Social Science Data</li> </ul>

	<p>Archive. Data from the Finnish Social Science Data Archive can be disclosed for research or teaching purposes, for example, once data that identifies a person has been removed from the data set.</p> <p>The information is not disclosed to third parties.</p>
<p><b>Transfers of information to third countries</b></p>	<p>The personal data is not disclosed or otherwise transferred outside the EU and EEA area.</p>
<p><b>Duration of storage / definition criteria of the personal data</b></p>	<p>The durations of storage for personal data at universities of applied sciences will be complied with in the storage of personal data. The contact information of the respondents and information on the language of service used in the data collection and submitted to CSC will be deleted after the data collection has ended.</p>
<p><b>The data subjects' access to their data, rectification or erasure of data and the right to request restriction of processing or right to data portability (General Data Protection Regulation, articles 15, 16, 17, 18 and 20)</b></p>	<p>Requests for data subjects' rights must be made in a controller specific manner. Information on controllers per university of applied sciences is available <a href="#">here</a>.</p> <p><b>Right of access by the data subject</b></p> <ul style="list-style-type: none"> <li>The data subject has the right to know the categories of the personal data concerning him/her which are processed and have been saved.</li> </ul> <p><b>Right to rectification</b></p> <ul style="list-style-type: none"> <li>The data subject has the right to obtain that incorrect, inaccurate or incomplete personal data concerning him/her is rectified or completed without undue delay.</li> </ul> <p>In addition, the data subject has the right to request the erasure of unnecessary personal data.</p> <p><b>Right to erasure</b></p> <ul style="list-style-type: none"> <li>Depending on the lawful basis for processing the data, the data subject may have the right to have personal data concerning him/her erased from the register of the higher education institution.</li> </ul> <p>Such right does not exist in cases, where the processing of personal data is necessary for compliance with a lawful obligation or in the exercise of official authority belonging to the higher education institution. In the storage and erasure of the data, the information management plan of the university of applied sciences and the storage times obligated by law are complied with.</p> <p><b>Right to request restriction of processing</b></p> <ul style="list-style-type: none"> <li>In certain situations, a data subject may have the right to request the restriction of processing personal data concerning him/her until the lawful basis for processing the data has been appropriately checked and corrected or complemented.</li> </ul> <p><b>Right to transmit the personal data from the system to another controller</b></p> <ul style="list-style-type: none"> <li>Transferring personal data from one system to another means that the data subject will receive the personal data they have supplied in a structured, commonly used, and machine-readable format, and they will be able to transfer the data to another controller.</li> </ul> <p>This right may apply only in situations where the processing is carried out by automatic means or is based on consent or on a contract.</p>

	<ul style="list-style-type: none"> <li>The right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</li> </ul>
<b>The data subject's right to object processing</b>	<p>The data subject shall have the right to object, on grounds relating to his/her particular situation, at any time to processing of personal data, when the lawful basis for processing the data is the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or the justified interest of the university of applied sciences. In this case, the data can be processed only if the controller demonstrates compelling legitimate grounds for the processing.</p> <p>The data subject shall have the right to object at any time to processing of personal data concerning him/her for direct marketing purposes.</p>
<b>The data subject's right to withdraw his/her consent</b>	<p>Where processing of the data subject's personal data is based on consent, the data subject shall have the right to withdraw his/her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.</p> <p>The withdrawal of consent shall be made by contacting CSC or the controller.</p>
<b>Right to lodge a complaint with a supervisory authority</b>	<p>Every data subject shall have the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to him/her infringes the EU's General Data Protection Regulation (2016/679). In addition, the data subject shall have the right to other effective administrative redress and effective judicial remedy.</p> <p>Further information <a href="http://www.tietosuoja.fi">www.tietosuoja.fi</a></p> <p>The data subject shall also have the right to bring proceedings against a controller or a processor organization, if he/she considers that his/her rights have been infringed as a result of the processing of his/her personal data in non-compliance with the General Data Protection Regulation.</p>
<b>Processing personal data for automatic decision-making, incl. profiling</b>	No