### Privacy statement for the data subject

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

<table>
<thead>
<tr>
<th>Name of the register:</th>
<th>National career monitoring survey for graduates of universities of applied sciences</th>
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<tbody>
<tr>
<td>Date:</td>
<td>1.10.2019</td>
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<tr>
<td>Controller, contact person and person in charge of the register</td>
<td>The national career monitoring survey is implemented as a part of the AMKista uralle – uraseurantatieidot käyttöön (From UAS to Career) project, which is coordinated by TUAS. Turku University of Applied Sciences Joukahaisenkatu 3, 20520 Turku Registry: (02) 263 350 The universities of applied sciences participating in the career monitoring survey are jointly controllers of the register. The information on each respective university of applied sciences is available here: <a href="https://wiki.eduuni.fi/display/CscArvo/TietosuojaTietosuojaTietosuoja">https://wiki.eduuni.fi/display/CscArvo/TietosuojaTietosuojaTietosuoja</a> and Opiskelun ja koulutuksen tutkimussäätiö Otus sr Lapinrinne 2, 00180 Helsinki Contact person for questions on the career monitoring survey register: Satu Helmi, Project Manager Joukahaisenkatu 3, 20520 Turku <a href="mailto:satu.helmi@turkuamk.fi">satu.helmi@turkuamk.fi</a>, tel. 050 598 5563</td>
</tr>
<tr>
<td>Data protection officer and contact information</td>
<td>The information on each respective university of applied sciences is available here: <a href="https://wiki.eduuni.fi/display/CscArvo/TietosuojaTietosuojaTietosuoja">https://wiki.eduuni.fi/display/CscArvo/TietosuojaTietosuojaTietosuoja</a> Opiskelun ja koulutuksen tutkimussäätiö Otus: <a href="mailto:tietosuoja@otus.fi">tietosuoja@otus.fi</a> Contact information for the career monitoring data collection: CSC – IT Centre for Science Data Protection Officer Marita Pajulahti <a href="mailto:tietosuoja@csc.fi">tietosuoja@csc.fi</a> More information: <a href="http://www.csc.fi/tietosuoja">www.csc.fi/tietosuoja</a></td>
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<tr>
<td>The purpose of maintaining the</td>
<td>The purpose of the career monitoring surveys is to monitor the working career and labour market situation of graduates from universities of applied sciences</td>
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| register and the lawful basis for processing personal data | (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. 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. Answers to the survey are requested from those who have completed a university of applied sciences degree in 2014. The answers are collected with the Education Management Info Service Arvo, which is maintained and developed by CSC – IT Centre for Science. Information which individualizes the respondent (e.g. student ID, name and address information) is used only for sending the survey and connecting it to the background information. The right of universities of applied sciences to process personal data as register controllers is based on the EU’s General Data Protection Regulation. The more specific grounds for processing are:  
- for the performance of a task carried out in the public interest or in the exercise of official authority (article 6.1 e)  
- for compliance with a lawful obligation (article 6.1 c)  
- and in certain cases, for a consent or a contract (article 6.1 a and b)  
Principal statutes  
- the Act on Universities of Applied Sciences 932/2014 and the regulations laid down by virtue of it  
- the General Data Protection Regulation (EU) 2016/679 and the complementing national statutes  
- the Act on National Education and Degree Registers 884/2017 (Chapter 5)  
- the Act on the Openness of Government Activities 621/1999 |
| A: Personal data is collected directly from you | Yes, with an electronic survey. |
| B: Personal data is collected elsewhere than from you | 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.  
CSC is responsible for the extraction of the personal information saved in the register and for the acquisition of the necessary contact information. |
| Data content of the register (a description on the data subject groups and the personal data groups) | The individualized and background information of the target group of the career monitoring survey (group of respondents) is saved in the register:

- University of applied sciences
- Student code
- Last name
- First name(s)
- Gender
- Email address
- Telephone number
- Postal address and code
- Place of residence
- Place of domicile
- 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

In terms of those who have responded to the career monitoring survey, the information in question is complemented with the information they have provided on placement in working life, factors related to the quality of employment and the respondent’s satisfaction with the studies from the point of view of career and working life.

The register does not contain personal information belonging to special groups of persons.

The background information returned with the CSV file to the respondent’s own higher education institution includes: 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. |
| Recipients and recipient groups of personal data (=disclosures) | For CSC, as the processor of personal data in the Arvo system, for the following processing measures: collection and storage of personal data on a server, solving problematic situations, compiling analyses and statistics on the material and submitting the material to the Finnish Social Science Data Archive.

Anonymized to the Finnish Social Science Data Archive for archiving.

The information is not disclosed to third parties. |
<table>
<thead>
<tr>
<th>Transfers of information to third countries</th>
<th>The personal data is not disclosed or otherwise transferred outside the EU and EEA area.</th>
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</thead>
<tbody>
<tr>
<td>Duration of storage / definition criteria of the personal data</td>
<td>The personal data is stored as long as it is necessary to conduct the analyses. The duration of storage of the personal data is specific to each university of applied sciences.</td>
</tr>
<tr>
<td>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)</td>
<td>The organizations listed as controllers operate jointly as controllers, thus defining the purposes and means of processing personal data together. The requests on the rights of the data subjects can be made directly to the processor of the personal data (CSC) or the contact person of the register: Satu Helmi, Project Manager Joukahaisenkatu 3, 20520 Turku <a href="mailto:satu.helmi@turkuamk.fi">satu.helmi@turkuamk.fi</a>, tel. 050 598 5563</td>
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</table>

**Right of access by the data subject**
- The data subject has the right to know the categories of the personal data concerning him/her which are processed and have been saved.

**Right to rectification**
- 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. In addition, the data subject has the right to request the erasure of unnecessary personal data.

**Right to erasure**
- 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. 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.

**Right to request restriction of processing**
- 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.

**Right to transmit the personal data from the system to another controller**
- Transmitting the personal data from a system to another means that the data subject can receive the personal data he/she has submitted in a structured, commonly used and machine-readable format and have
the right to transmit those data to another controller without hindrance from the higher education institution. 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.

- 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.

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<tr>
<th>The data subject’s right to object processing</th>
<th>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. The data subject shall have the right to object at any time to processing of personal data concerning him/her for direct marketing purposes.</th>
</tr>
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<tbody>
<tr>
<td>The data subject’s right to withdraw his/her consent</td>
<td>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. The withdrawal of consent shall be made by contacting CSC or the controller.</td>
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<tr>
<td>Right to lodge a complaint with a supervisory authority</td>
<td>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. Further information <a href="http://www.tietosuoja.fi">www.tietosuoja.fi</a> 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.</td>
</tr>
<tr>
<td>Processing personal data for automatic decision-making, incl. profiling</td>
<td>No</td>
</tr>
</tbody>
</table>