



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:

Director of Administration Ari Konu
ari.konu@ulapland.fi

Controller's contact person

Director Antti Koski
antti.koski@ulapland.fi

Education Manager Niina Romakkaniemi
niina.romakkaniemi@ulapland.fi

Education Manager Krista Rautio
krista.rautio@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

Webropol is used in the University of Lapland's Education and Development Services unit to support regional development and continuing education work. Webropol is used for

organizing various events and activities, for example for receiving registrations, stakeholder and customer feedback surveys and surveys. The information collected through registration surveys is used for administrative purposes (maintenance of the study register: in this case, the data is entered into the University of Lapland's Peppi study register system based on the legal obligation of the controller, which has its own privacy policy) and to inform about the event or occasion. In addition, the personal data collected through surveys may be used for marketing communications of the University of Lapland for those registrants who have given their explicit consent (in this case, the personal data are exported to the University of Lapland's CRM system MS Dynamics, which has its own separate privacy policy). The University of Lapland may also use the data for statistical purposes and to report on participants' background information to funders.

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
- ☒ compliance with a legal obligation to which the controller is subject
which legal obligation in question: Universities Act (558/2009), General Data Protection Regulation (GDPR, EU, 2016/679) with supplementary National legislation, Act on the National Registers of Education Records, Qualifications and Degrees (A1129/2014), Act on the Openness of Government Activities (L621/1999), Decree on the Openness of Government Activities and on Good Practice in Information Management (A1030/1999), Administrative Procedure Law (L434/2003), Administrative Judicial Procedure Act (L586/1996), Statistics Act (L280/2004), Act on Financial Aid for Students (L65/1994), Government Decree on Financial Aid for Students (L869/2017), Unemployment Security Act (L1290/2002), Data Protection Act (1050/2018)
- ☒ performance of a task carried out in the public interest or in the exercise of official authority vested in the controller:
which public interest in question: a person's position, duties or functions, public interest function, scientific or historical research or statistics
- ☒ legitimate interests pursued by the controller or by a third party
which legitimate interest in question:

Sensitive data are processed in compliance with the exceptions in Article 9(2) of the GDPR. The following legal basis are:

- ☒ explicit consent

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
- e-mail address

- consent to the processing of personal data

In addition, it's possible to save:

- date of birth
- home address
- telephone number
- professional or specialist sector, if any
- customer or stakeholder information
- name of the registered background organisation
- position or function in the organisation
- address of the background organisation
- sector of activity and service sector of the background organisation
- information on participation in the event
- health information: allergies and dietary requirements for catering at the event
- payment and transaction details

The data to be stored varies from event to event and from survey to survey. However, only the information necessary for the event or occasion in question is always recorded. Additional information provided by e-mail, telephone or at a meeting, or clarifications of information already provided, may also be recorded if they have an impact on the organisation of the event or occasion. Event-specific data will be deleted when they are no longer needed for the implementation or follow-up of the event in question. If there is a regular archiving period for the replies to the questionnaire, this will be respected. If the data collector's employment with the University of Lapland is terminated, the administrator has the right to delete the questionnaires and their data from Webropol.

7. Data sources

The information is collected via an electronic form for each event when registering for the event. It is not possible to register for an event without submitting the mandatory event-specific information. Failure to provide health information (allergies and dietary requirements) may result in inappropriate event catering. There are no sanctions for failure to provide this 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. The technical maintenance of the system is the responsibility of the software supplier. The system's servers are located in Finland. The connection between the application and the server is secure. Access to the register is limited to users who have been specifically granted access rights 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 browser-based Webropol system. If necessary, data may be stored in the Peppi student register of the University of Lapland on the basis of the legal obligation of the controller and in the MS Dynamics CRM system on the basis of the data subject's consent. These two systems have their own data protection notices.

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)