

## **Data Protection Notification LITO Basic Business Studies module (15.2.2023)**

### **1. Data controllers**

The register is a joint register whose parties are

University of Turku  
20014 University of Turku  
tel. +358 29 450 5000

and the other data controllers

Aalto korkeakoulusäätiö sr, P.O. Box 11000, 00076 Aalto, tel. +358 9 470 01

University of Helsinki, P.O. Box 4, 00014 University of Helsinki, tel. +358 294 1911

University of Eastern Finland, P.O. Box 111, 80101 Joensuu, tel. +358 29 445 1111

University of Jyväskylä, P.O. Box 35, 40014 University of Jyväskylä, tel. +358 14 260 1211

Lappeenranta-Lahti University of Technology LUT, PL 20, 53851 Lappeenranta, tel. +358 29 446 2111

University of Oulu, P.O. Box 8000, 90014 University of Oulu, tel. +358 29 448 0000

Svenska handelshögskolan Hanken, PB 479, 00101 Helsingfors, tel. +258 29 431 331

Tampere University Foundation sr, which operates as the Tampere University, 33014 Tampere University, tel. +358 29 452 11

University of Vaasa, P.O.Box 700, 65101 Vaasa, tel. +358 29 449 8000

Åbo Akademi, Domkyrkotorget 3, 20500 Åbo, tel. +358 2 215 13

### **2. Contact persons**

University of Turku  
Contact person: Eeli Saarinen  
Data Protection Officer: dpo@utu.fi

Aalto-korkeakoulusäätiö sr (Aalto University)  
Contact person: Pia Lahti  
Data Protection Officer: tietosuojavastaava@aalto.fi

University of Helsinki  
Contact person: Janna Pietikäinen  
Data Protection Officer: tietosuoja@helsinki.fi

University of Eastern Finland  
Contact person: Mirjami Ikonen  
Data Protection Officer: tietosuoja@uef.fi

University of Jyväskylä  
Contact person: Anna Salonen  
Data Protection Officer: tietosuoja@jyu.fi

Lappeenranta-Lahti University of Technology (LUT University)

Contact person: Hanna Salojärvi

Data Protection Officer: tietosuoja@lut.fi

University of Oulu

Contact person: Joakim Tervonen

Data Protection Officer: dpo@oulu.fi

Svenska handelshögskolan Hanken

Contact person: Susanna Taimitarha

Data Protection Officer: dpo@hanken.fi

Tampere University Foundation sr, which operates as the Tampere University

Contact person: Pekka Nykänen

Data Protection Officer: dpo@tuni.fi

University of Vaasa

Contact person: Susanna Kultalahti

Data Protection Officer: it@uwasa.fi

Åbo Akademi

Contact person: Barbro Schauman

Data Protection Officer: dataskydd@abo.fi

### **3. Purpose of the register**

The purpose of the register is to enable the realization of the LITO study module as completely online teaching. The data controller collects from the participating universities information of the students who have registered to the courses (collected information is specified in chapter 5) in order

- a) to arrange their access to the electronic learning platform
- b) to create study rights for the students in the host university/universities responsible for organizing the course, and
- c) to transfer study credits between the host university's/universities' systems and the student's home university without the student having to ask for the transfer as a separate process.

To receive credits for the courses, students must be granted the right to attend the courses for which they have registered from the host university. To grant the right to attend a course (or courses), the home university will transfer personal student information to the host university responsible for organising the course. The data to be transferred includes the student's surname, first name, possible middle name(s), gender, nationality, e-mail address, personal identification number and home university. If a student does not have a Finnish personal identification number, his/her date of birth will be transferred. Data classified as secret will not be transferred. Receiving credit for the course(s) is not possible without transferring personal student information.

The email address of the student is used for notifications related to LITO studies (for example, the teachers can notify the students about course practices via email before the course begins).

### **4. Lawful basis of the processing**

The lawful basis of the processing of personal data stored in the register are:

(1) compliance with a legal obligation (e.g. the Universities Act (558/2009) and the related decrees, the Act on the National Registers of Education Records, Qualifications and Degrees (884/2017)

(2) the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller in those situations where the right to processing cannot be directly derived from the provision on the authority.

## **5. Contents of the register**

The LITO courses are implemented on the Digicampus learning platform. The user can log in to the Digicampus system either with HAKA or Google account.

Personal data stored in the Digicampus service:

a) basic user data: identifiers (name, learner ID), login data (login method, user name, linked login profiles), contact data (e-mail address)

b) study-related data: course registration data, course and other study-related assessments/grades, assignments returned in courses and their assessments/grades

c) communication data: discussions and communications stored in the system by users regarding e.g., study-related advice and guidance, blog entries

d) log data about user activities on the Digicampus platform, requests for user support

Teachers and coordinators of the LITO study module use this information in teaching and in developing teaching and the study module.

In addition, the user can store other personal data in the Digicampus learning environment. LITO does not need or use these data, but they are visible to other users.

## **6. Regular data sources of the register**

The basic user data needed for granting a study right are obtained from the study registers of the universities that are members in the LITO network based on a student's registration for a course. The data is also used to transfer study credits and grades from the register of the host university to the register of a student's home university.

A teacher's basic information is received from the teacher's own university, once the teacher is set to teach in a LITO course.

Data sources in the Digicampus learning platform: see the [Digicampus Privacy Statement](#).

## **7. The period for which data is stored**

User profile is stored until the user has not used the Digicampus service for 12 months. Students' access to a course site in Digicampus will be closed after 6 months since the closing date of the course. Teachers' access to a course site will be closed after 6 months since the closing date of the course.

## **8. Regular data transfers, transfers of data outside EU/EEA**

Personal data are not transferred outside the EU or EEA.

User data can be transferred between the participating universities in LITO collaboration.

Anonymized analytics data can be handed over for research purposes. Person's identity cannot be deduced from the anonymized data.

Based on legal requirements, the data controller may hand off information to third parties.

The standard privacy policy of the Digicampus service is available through [this link](#).

## **9. Protection principles of the register**

Usage rights to the personal information is granted only to those people authorized by the data controller, who need the information as part of their duties in LITO collaboration. All users have personal accounts to the system where data is stored.

The data controller limits the information visibility through different roles and usage rights. The people are bound by professional secrecy.

The data in the Digicampus service is stored databases which are protected by firewalls, passwords and other technical safeguards. Databases and their backups are located in locked facilities and can be accessed only by designated persons.

## **10. Your rights as a data subject**

You have the right to obtain information on the processing of your personal data and to inspect to personal data concerning you and processed by the controller. You have the right to demand the rectification of inaccurate or deficient data as well as to demand erasure of the personal data concerning you.

Your right to demand erasure of the personal data concerning you may be subject to the purpose for which the data is processed. The data controller will not be required to erase your data, however, if the personal data is justifiably processed e.g. for compliance with legislation, or for the exercise of the official authority vested in the educational institution.

In certain cases, you can request the processing of your personal data to be restricted until the data or the lawful basis of its processing is duly amended, and rectified, or supplemented.

If you yourself have supplied the personal data concerning you and the processing of the data is based on your consent or an agreement between yourself and the controller, you have the right to receive the personal data concerning you from the controller in a commonly used format and to transfer them to another controller. If the data is processed based on your consent, you have the right to withdraw your consent.

You can also object to the processing of your personal data on grounds relating to your particular situation. Objecting is possible if the data is being processed on the basis of public interest, or the exercise of official power, or on the basis of legitimate interest of the controller. You must specify the reasons for objecting to the processing your personal data in your request. The data controller can refuse your request only on legal grounds. You have also right to object to the processing of your personal data for direct marketing.

You have the right to lodge a complaint with the supervisory authority if you consider that the processing of personal data concerning you is processed in breach of data protection regulations in force. The competent authority in Finland is Office of the Data Protection Ombudsman, P.O.Box 800, 00521 Helsinki, tietosuoja@om.fi.

In data protection matters, contact your home university. The contact details are given in Section 2 of this statement.