

DATA PROTECTION ANNOUNCEMENT

**Categories of alumni, marketing,
customer and partner data**

**South-Eastern Finland
University of Applied Sciences**

The document is based on Articles 13 and 14 of the European Union's General Data Protection Regulation (GDPR). The document is published in order to meet the requirements on data protection stated in the GDPR.

Title of the Guidelines	GDPR – information to be given to data subject: DATA PROTECTION ANNOUNCEMENT		
Person in Charge	Tiivi Pukkila-Nupponen		
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Kaakkois-Suomen
ammattikorkeakoulu

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1 Controller

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3 Name of register

Partnership and stakeholder register of South-Eastern Finland University of Applied Sciences

4 Reasons and legal basis for processing personal data

Personal data is collected for the purposes of

- carrying out cooperating between the university of applied sciences and companies/organisations, performing RDI activities, taking care of customer and stakeholder relations (including sale of services, implementation of cooperation projects and cooperation with alumni)
- marketing and communications

As far as RDI activities and cooperation related to teaching are concerned, the processing of data is based on the statutory duties of universities of applied sciences, as established in the Universities of Applied Sciences Act (932/2014).

Where this is not applicable, the processing of personal data is based on a relevant connection or on the performance of a contract to which the data subject is party. Processing of data is justified on grounds of legitimate interest pursued by the university of applied sciences when dealing with business activities and processing data of potential customers. In these cases, personal data is saved to enable contacting a potential customer. The personal data of a potential customer is erased from the register if a customer relationship is not formed or stakeholder cooperation initiated.

Processing the personal data of alumni is based on consent given by them when joining the alumni network of South-Eastern Finland University of Applied Sciences, or its predecessors Kymenlaakso or Mikkeli University of Applied Sciences.

Similarly, the processing of data of persons participating in events organised by Xamk is based on the data subject's consent given when registering for the event.

4.1 Legitimate interests

Processing of data is justified on grounds of legitimate interest pursued by the university of applied sciences when dealing with business activities and processing data of potential customers. In these cases, personal data is saved to enable contacting a potential customer.

5 Personal data categories to be processed

Person's name, telephone number, email address and postal address. Person's job title and name of employer; or name of organisation which the person represents in capacity other than employee. The processing of alumni information includes, in addition to the items listed above, degrees taken, name of higher education institution, year in which the studies were begun, year of graduation, and place of study.

As a rule, the telephone and address information are for the person's workplace. If the information is obtained from the person himself/herself, it may also be his/her personal telephone number and home address.

6 Recipients or groups of recipients of personal data

No data from the register is disclosed to third parties.

7 Information on transferring data to third countries

No data from the register is transferred to countries outside the EU or EEA.

8 Period of storing personal data

Personal data is stored for as long it is needed. Personal data concerning a data subject is erased from the register, if the data subject so requests. If the data subject withdraws his/her consent to use his/her personal data for a specific purpose, this information is entered in the data of the person concerned.

9 Rights of the data subject

9.1 Right to access

The data subject has the right to request access to information concerning him/herself. The request is made in writing to Data Security Coordinator, or through the electronic form available at www.xamk.fi/tietosuojailmoitus. In the request, the data subject must specify which information the request concerns.

9.2 Right to rectification

The data subject has the right to request rectification of his/her information. This request is made to the Data Security Coordinator. The controller also updates personal data in its customer or stakeholder register on its own initiative, whenever the processor of personal data operating on behalf of the controller receives information about the necessary updates either from the data subject, or from public sources.

9.3 Right to erasure

The data subject may prohibit, either in writing or orally, Xamk from using his/her personal data for marketing and communication purposes. This prohibition is entered in the register. The data subject may also request that his/her personal data be erased from the customer and stakeholder register. Following such request, the data is erased, unless South-Eastern Finland University of Applied Sciences has legal grounds for retaining the data, such as for the purposes of meeting a contractual obligation, or implementing teaching or RDI activities.

9.4 Right to restriction of processing

The data subject has the right to restrict the processing of data, if one of the following conditions is met:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims
- the data subject has objected to processing pursuant to Article 21(1) of the Regulation pending the verification whether the legitimate grounds of the controller override those of the data subject.

9.5 Right to data portability

The data subject has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a machine-readable format, if the processing is based on consent and carried out by automated means.

9.6 Right to withdraw consent (if processing is based on consent)

Where the processing of personal data is based on consent (alumni or those participating in events), the data subject has the right to withdraw his/her consent by submitting a written notification about it to Data Protection Coordinator.

9.7 Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, every data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the Regulation.

The complaint is addressed to Data Protection Ombudsman, <https://tietosuoja.fi/en/home>

10 Statutory or contractual requirement

Information must be given on whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and on the possible consequences of failure to provide such data.

Where a customer relationship or cooperation is based on a contract, sufficient personal data for its preparation and implementation is a precondition for concluding such contract.

11 Information on how personal data has been acquired (if not from the data subject)

Personal data included in the customer and stakeholder register is obtained from public sources, including websites or business information directories, or personally from the data subject.

Date	Revised chapters /pages	Description
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24 May 2018		JJ