



Kaakkois-Suomen  
ammattikorkeakoulu

# DATA PROTECTION ANNOUNCEMENT

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

South-Eastern Finland  
University of Applied Sciences  
Ltd

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.

<b>Title of the Guidelines</b>	GDPR – information to be given to data subject: DATA PROTECTION ANNOUNCEMENT		
<b>Person in Charge</b>	Tiivi Pukkila-Nupponen		
<b>Effective from</b>	25 May 2018	<b>Decision</b>	Data Protection Group 25 May 2018
<b>Updated</b>	19 November 2020	<b>Updated by</b>	Markus Häkkinen



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## 1 Controller

South-Eastern Finland University of Applied Sciences  
P.O. Box 68 (Patteristonkatu 3)  
50101 Mikkeli  
Tel. +358 40 655 0555  
Business ID: 2472908-22

### **Coordinator of alumni, marketing, customer and partner data category:**

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## 2 Data Protection Officer

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## 3 Name of register

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

## 4 For what purposes is my personal data processed?

Personal data is collected for the purposes of carrying out teaching-related cooperation with companies/organisations, managing customer and stakeholder relations related to cooperation with companies/organisations and RDI activities, and improving the customer experience; including sale of services, implementation of cooperation projects, and marketing and communication related to alumni cooperation.

**Marketing and cookies.** We collect and process certain information when you visit our website or other digital platforms. We may also use cookies in our services.

**Personalisation of services.** We aim to constantly improve our communication and make our services more up-to-date. For this reason, we may provide personalised content based on an individual visit to the website, such as news about an education that interests you.

In addition, within the framework of data protection legislation, we also use customer data for other purposes, such as product development, customisation of our services and personal advertising.

**Targeting of marketing.** We and our advertising partners use the information to create personalised advertisements that may appear on the websites and applications of other service providers. In doing this, we and our advertising partners use technologies commonly used in the market, within the framework of data protection legislation. This allows us to advertise in a targeted way and display content that may be interesting to a potential student, for example.

**Alumni system.** As of 31 January 2020, all Xamk graduates are automatically added as members of the alumni register – a system including students who have graduated from Kymenlaakso or Mikkeli University of Applied Sciences, or from Xamk. Membership in the register does not obligate you in any way. The members receive, for example, newsletters about Xamk's alumni activities and training and education opportunities. The data in the register is not provided to third parties. For the purposes of conducting the nationwide career monitoring surveys, it is very important that Xamk reaches its graduates. The processing of personal data is based on Article 6.1.f of the GDPR under which *processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party*.

## 5 What are the grounds for processing my personal data?

The grounds for processing personal data

- a. As far as RDI activities and cooperation related to teaching are concerned, the processing is based on the need to perform a task carried out in the public interest (Article 6.1.e) and to fulfil the statutory duties of universities of applied sciences, as established in the Universities of Applied Sciences Act (932/2014).
- b. In terms of information related to business management and development, and the data of potential customers, the processing is based on Article 6.1.f., *processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party*.
- c. The processing of data of persons participating in events organised by Xamk is based on the data subject's consent (Article 6.1.a) given when registering for the event.
- d. Otherwise 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 (Article 6.1.b).

The abovementioned legitimate interest can exist for example where there is a relevant and appropriate relationship between the data subject and the controller which arises when the data subject has a relationship with the controller related to the purpose of the register. The processing must also be for such purposes that the data subject can reasonably expect at the time and in the context of the collection of the personal data. The alumni system is an example of this. In these cases, personal data is saved to enable contacting a potential customer.

## **6 What data is processed?**

- Person's name
- Date of birth
- Phone number
- Email address
- Postal address
- Degree programme and degree title
- Start year of studies and year of graduation
- 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 institute
- year in which the studies were begun
- year of graduation
- 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.

## **7 Is my personal data disclosed to third parties?**

No data from the register is disclosed to third parties.

## **8 Is my data processed outside the EU or EEA?**

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

## **9 For how long is my data kept?**

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.

## **10 How can I use my data protection rights under the Data Protection Regulation?**

### **10.1 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 <https://www.xamk.fi/en/xamk2/data-protection-announcement/>. In the request, the data subject must specify which information the request concerns.

### **10.2 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.

### **10.3 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.

#### 10.4 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.

#### 10.5 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 the controller, in a machine-readable format, if the processing is based on consent and carried out by automated means.

#### 10.6 Right to withdraw consent (if processing is based on consent)

Where the processing of personal data is based on consent (for example 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.

#### 10.7 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>



## **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. Alumni contacts are retrieved from the student register of the educational institute.