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## DATA PROTECTION NOTICE

in accordance with the EU General Data Protection Regulation (GDPR) Articles 13 and 14

### This notice applies to:

#### 1. General Purpose:

- Alumni interviews
- News related to alumni, such as:
  - Alumni achievements in their field and graduation
  - Projects, research, or career updates involving alumni
  - Information about collaborations or initiatives involving alumni
  - These updates are published on novia.fi and shared on social media platforms such as Facebook, LinkedIn, and Instagram to reach a broad audience of alumni and interested parties.

#### 1. Novia's Alumni Activities

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### Data Controller

Novia University of Applied Sciences  
Wolffintie 31  
65200 Vaasa  
Finland  
[www.novia.fi](http://www.novia.fi)

Novia University of Applied Sciences is the data controller for personal data collected and processed within the university's operations – including teaching, guidance, research and development, administration, and collaboration, both internal and external.

### Responsible unit for the processing described in this document:

Communications

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**Contact person:**

Bella Alén, Alumni Coordinator, Phone: +358 50 472 7805

**Data Protection Officer at Novia University of Applied Sciences:**

[dataskyddsbud@novia.fi](mailto:dataskyddsbud@novia.fi), +358 6 328 5000 (switchboard)

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**Why do we process your personal data?**

We process your personal data to publish alumni interviews, stories, and news about the achievements and successes of our former students. The purpose is to highlight inspiring career paths, strengthen connections with alumni, and demonstrate the value of education in working life. The information is used only in contexts where you have given your consent for publication.

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**Legal Basis for Processing**

**According to GDPR, there must be a legal basis for processing personal data. The legal bases for processing your personal data are:**

**Consent (Art. 6.1 a)**

You are asked and voluntarily agree (in writing or verbally) to the processing of your personal data for a specific purpose. You give consent after receiving information about how your data will be handled (e.g., collected, stored, shared, archived). When consent is the sole legal basis, you have the right to withdraw it at any time by emailing [registrator@novia.fi](mailto:registrator@novia.fi). Processing carried out before withdrawal remains unaffected.

**Contract (Art. 6.1 b)**

You have entered into or are about to enter into a contract with Novia University of Applied Sciences, and processing your personal data is necessary to fulfill that contract.

**Justification:**

Processing is based on both consent (Art. 6.1 a) and contract (Art. 6.1 b). You voluntarily agree to the use of your data for publishing alumni interviews, stories, and news. You may withdraw your consent at any time without affecting prior processing. Contract is the legal basis for using interviews, images, videos, or audio recordings of you as an alumnus to promote Novia's alumni activities. It also applies when Novia uses materials you have voluntarily shared.

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Consent is the legal basis for transferring personal data outside the EU/EEA in specific situations mentioned in this notice.

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### **What personal data do we process and who processes it?**

We process the following personal data:

- Name
- Graduation year and study program
- Contact details (e.g., email, phone – if voluntarily provided)
- Photos and videos (if you participate in photo or video sessions)
- Quotes and stories from the interview
- Workplace and title (if included in the alumni story)
- Possible audio recordings from the interview

Data is processed by:

- Communications department and/or alumni coordinator at Novia
- IT staff or web administrators at Novia for technical publishing
- External data processors (e.g., printing houses, graphic designers, web agencies) hired for production or publishing

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### **Where do we collect your personal data and how is it processed?**

#### **1. Collection:**

Data is collected directly from you as an alumnus when you voluntarily participate in an interview or share information about your career and educational background. Collection may occur via email, phone, video call, or in-person meeting. Photos or videos are taken with your consent during interviews or separate sessions. Information may also be sourced from news articles.

#### **2. Processing and Storage:**

- Interview responses are manually documented and transcribed.

- a. Photo and video materials are handled in secure cloud services approved by Nova.
- b. Materials are stored in internal folders and publishing tools used by Nova's communications department.

**3. Deletion and Archiving:**

Personal data is retained as long as it is relevant for publication and communication. Unused materials are deleted no later than 15 years after collection unless there are specific reasons to retain them (e.g., long-term documentation of alumni activities). Published materials may be archived in Nova's systems according to internal archiving procedures. If you withdraw consent, materials will be deleted where possible, except for already published content retained for editorial or archival reasons.

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**Is your personal data transferred to third parties (outside Nova)?**

Yes. Some personal data may be transferred to third parties for technical processing related to publishing and communication, such as:

- Publishing platforms or web hosts
- Graphic designers or printing houses
- Photographers or video producers

Transferred data may include name, photo, job title, and interview quotes. Transfers occur only with your valid consent. A data processing agreement is in place between Nova and the third party in accordance with applicable data protection laws.

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**Is your personal data disclosed to third parties outside Nova?**

Yes. Personal data such as name, title, photo, and quotes may be disclosed to external media or partners for joint publication of alumni stories. Disclosure occurs only with your consent and in compliance with data protection laws. No data is shared for marketing or commercial purposes without approval.

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**Is your personal data transferred outside the EU/EEA?**

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Yes. Personal data may be temporarily transferred outside the EU/EEA due to the tools used. In some cases, data may be transferred to third-party providers based outside the EU/EEA, e.g., if external tools for storage or publishing have servers in other countries. Such transfers are temporary and all GDPR safeguards (e.g., contractual clauses, security protocols) are applied to ensure adequate protection.

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### **What rights do you have when Novia processes your personal data?**

Novia is responsible for implementing appropriate technical and organizational measures to protect personal data from unauthorized or unlawful processing and from damage or loss. Data must always be processed fairly and transparently in accordance with applicable regulations.

Under GDPR (Art. 12–22), you have the right to:

- Receive clear information about how your data is processed and how to exercise your rights (Art. 12)
- Access your personal data and information about its processing (Art. 15)
- Have your data corrected (Art. 16) – employees and students at Novia can make corrections themselves via the intranet
- Have your data deleted (“right to be forgotten”) in certain situations (Art. 17)
- Restrict processing in certain situations (Art. 18)
- Transfer your data between systems in certain situations (Art. 20)
- Object to processing in certain situations (Art. 21)
- Not be subject to automated decision-making, with some exceptions (Art. 22)

You also have the right to be informed of any data breach that poses a high risk to your personal data (Art. 34).

When processing is for scientific research, statistics, or archiving purposes, rights may be limited under the Finnish Data Protection Act (1050/2018). Limitations require specific safeguards.

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For questions about your rights, contact the responsible person listed above or Novia's Data Protection Officer (dataskyddsbud@novia.fi). See also general information on data processing at Novia: <https://www.novia.fi/om-oss/styrande-dokument/dataskydd/>

You have the right to file a complaint with the data protection authority if you believe your data has been unlawfully processed under GDPR.

**Contact details for the Data Protection Authority:**

Office of the Data Protection Ombudsman

P.O. Box 800

00531 Helsinki

+358 29 566 6700 (switchboard)

[tietosuoja@om.fi](mailto:tietosuoja@om.fi)

<https://tietosuoja.fi>

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**APPENDIX: Additional Information for Long-Term Registers, Systems, or Tools**

**INSTRUCTIONS:**

1. If this notice is for a specific purpose (e.g., thesis, project), delete this appendix.
2. If this notice is for a long-term register, system, or tool, fill in the information below.

**Protection Principles:**

The register is protected according to Novia's IT guidelines and through direct control of login rights.

**Storage Principles and Duration:**

Information is stored for up to 15 years, as it remains relevant for students and applicants over time. The purpose is to showcase career opportunities after education.

**List of Regular Sources:**

Novia receives information directly from alumni and from news and social media where alumni appear.

**Details on Automated Decision-Making:**

No automated decision-making is used.