

PRIVACY NOTICE

according to the EU General Data Protection Regulation GDPR, Art. 13 and 14

This notice concerns:

A tool: Novia Network (CRM)

Personal data controller

Yrkeshögskolan Novia
Wolffskavägen 31
65200 Vasa
Finland
www.novia.fi

Novia University of Applied Sciences is controller for the personal data collected and processed in the Novia UAS activities – in teaching, guidance, research and development, administration, and cooperation, internally and externally.

Responsible unit for the processing that is described in this notice:

University President's administration

Contact Person:

Clara Kankaanpää, clara.kankaanpaa@novia.fi, +358505252221

Data Protection Officer at Novia University of Applied Sciences:

dataskyddsbud@novia.fi, +358 6 328 5000 (switchboard)

For what purpose do we process your personal data?

We process your personal data within the framework of Novia's activity. Novia Network is Novia's CRM program for external contacts. Novia Network is used in order to manage Novia's customers, partners, interest groups and business contacts in a structural and central way. We use Novia Network to systematically identify our customers' and partners' needs and sales associated assignments that Novia is responsible for.

According to GDPR there must be a legal basis for processing personal data. The legal basis for processing your personal data is:

Consent (Art. 6.1 a)

You are consulted and answer yes (by written or oral statement) to that your personal data is processed for a specific purpose. You give your consent freely after getting information about how your personal data is processed (e.g., collected, stored, shared, archived, etc.). When consent is the only legal basis for processing your personal data, you have the right to withdraw at any time. You can notify that you regret your consent by sending an e-mail to registrator@novia.fi. The processing completed before you withdrew consent is not affected.

Contract (Art. 6.1 b)

You have a contract or are about to enter a contract with Novia University of Applied Sciences, and it is necessary to process your personal data in order to fulfill the contract.

Public interest or official authority (Art. 6 1 e)

Novia University of Applied Sciences has statutory tasks of public interest and the right to exercise official authority according to the Universities of Applied Sciences Act. Scientific research is an example of a statutory task of public interest.

Legitimate interest (Art. 6.1 f)

It is necessary to process personal data for a purpose that concerns the legitimate interest of Novia University of Applied Sciences or another party. Your personal data can then only be processed if a balancing test shows that the protection of your personal data does not outweigh the legitimate interest. Legitimate interest cannot be a legal basis when Novia University of Applied Sciences performs its statutory tasks as a university of applied sciences.

Justification:

Partners and external contacts

Novia registers contacts such as clients for student's thesis and internships. The legal basis for processing data for thesis work is Contract (Art. 6.1 b) and the legal basis for processing data for internships is Public interest or official authority (Art. 6 1 e).

Alumni information

Data about the graduated is transferred from the study register Peppi to Novia Network. The legal basis for processing this data is Public interest or official authority (Art. 6 1 e), based on the European Union General Data Protection Regulation in accordance with Finnish Personal Data Act 4.1. The Universities of Applied Sciences role is, e.g., to offer opportunities for continuing education, cooperation with the rest of the society and to follow up on the graduates' careers (Universities of Applied Sciences Act 4 §). In order to fulfill these tasks, it is necessary to maintain a personal data register on the alumni.

Fundraising

Novia has permission to fundraise in order to fulfill its role according to the Universities of Applied Sciences Act, 4 §. When Novia is fundraising, the donors' personal data is registered in the CRM system. The legal basis for processing this data is Legitimate interest (Art. 6.1 f).

Continuing Education

When Novia is arranging continuing education the participants' personal data is registered in Novia Network. The legal basis for data processing when participants register themselves for continuing education is Consent (GDPR art. 6.1 a). The legal basis for processing personal data in connection with payment is contract (GDPR art. 6.1 b).

Member register/Novium

Student union Novium uses Novia Network as a register for their members. In Novia Network the members can apply for study cards (CardPlus/Slice). The legal basis for processing personal data in connection with payment is contract (GDPR art. 6.1 b).

Which personal data do we process, and who processes the data?

Novia Network contains the following personal data:

Data about alumni that is transferred directly from the study register Peppi: first name, last name, earlier last name, social security code, e-mail address, phone number, degree, education, place of education.

External contacts: name, address, phone number, e-mail address, nationality, position, company, gender, and language of contact

Personal data collected when paying in the payment service Paytrail is registered in order to verify who has made a payment for an event/course/seminar where the registered has signed up via Novia Network. The following information is registered when paying by Paytrail: name, e-mail address, phone number, street address, postal code, postal address, country, the product paid for, time of payment, sum and payment method.

- The payer chooses the product/service themselves and fills in their personal information. Information about the payment is issued by the payment service Paytrail to the economic department in Novia. No credit card information is stored by Novia, this information is given by the registered to Paytrail only.

Novium Membership: first name, last name, date of birth, social security number, home address, phone number, e-mail address, county, country, campus, planned year of graduation, picture of the student.

Student card CardPlus: first name, last name, date of birth, picture of the student.

Student card Slice: first name, last name, date of birth, e-mail address, planned year of graduation, type of membership (year/semester), date when the membership was bought, the period of validity for the membership, picture of the student.

Only staff at Novia have access to the CRM-system Novia Network. The user rights are distributed to the staff according to their needs (in their work tasks). User rights are connected to employment, which means that one's user rights are automatically deleted when the employment is terminated.

Where do we collect your personal data from and how do we process the data?

The data is collected within the framework of Novia's activity via Novia's administrative systems (e.g., the study register Peppi for alumni information) or directly from the registered themselves (e.g., when ordering a study card or enrolling in a continuing education course).

The principle for the protection of personal data is based on personal data categories, the legal basis and management. Personal data is never processed more than needed. Every employer is responsible for following the principles of Purpose Limitation, Data Minimization and Storage Minimization. Personal data is processed as safely as possible.

Data from the study register Peppi will not be transferred to Novia Network if the person has denied consent to the transfer or if the person has a non-disclosure for personal safety reasons. The personal data is deleted when the data is no longer necessary or if the registered asks for their data to be deleted.

Information about alumni is saved permanently since one is an alumnus for life. The information is deleted if the registered asks for it to be deleted.

The information for events is saved permanently since the data is needed for statistical use. The information is deleted if the registered asks for it to be deleted.

The information for Novium and study cards is saved permanently, or until the registered asks to have their data deleted.

We follow up on the information about external contacts to make sure it is up-to-date and delete the information when it is no longer needed. The information is also deleted if the registered asks for it to be deleted.

Is your personal data transferred (outside Novia University of Applied Sciences) for processing?

Yes, personal data may be transferred for processing outside Novia.

Novia Network is supplied by the Swedish company Mira Network. A separate contract has been conducted for the processing of personal data.

Personal data is transferred to the payment service Paytrail to make payments through Novia Network.

Personal data is also transferred to CardPlus and/or Slice when ordering a student card.

In Novia Network it is possible to download reports in Microsoft Excel for internal use only. Novia Network is not gathering excessive data.

Is your personal data transferred to a third party (outside Novia University of Applied Sciences) for that party's purposes?

No, personal data will not be transferred outside Novia University of Applied Sciences.

Is your personal data transferred outside EU/EEA?

Yes, personal data may be transferred temporarily outside EU/EEA due to the tool being used. Novia is not actively transferring data outside EU/EEA, but Novia Network consists of components Microsoft (Excel) and Paytrail who process data also outside EU/EEA.

Which rights do you have when Novia University of Applied Sciences processes your personal data?

Novia University of Applied Sciences is responsible for taking appropriate technical and organizational measures to protect personal data against unauthorized or illegal processing and against damage to or loss of personal data. Personal data must always be processed in a fair and transparent manner in accordance with applicable data protection regulations.

According to the EU General Data Protection Regulation GDPR (Art. 12-22), you have the right to

- get transparent information on how your personal data is processed and how you can exercise your rights (Art. 12)

- get access to your personal data at Novia University of Applied Sciences and information on the processing of data (Art. 15)
- have your personal data corrected (Art. 16). Note that employees and students at Novia University of Applied Sciences can in most cases correct their own data according to the instructions on the intranet.
- have your data erased ("the right to be forgotten") in certain situations (Art. 17)
- restrict the processing of your personal data in certain situations (Art. 18)
- have your personal data transferred between systems in certain situations (Art. 20)
- object to the processing of your personal data in certain situations (Art. 21)
- not be subject to automated decision-making, with certain exceptions (Art. 22)

Also, you have the right to be informed of a personal data breach involving a high risk to your personal data (Art. 34).

When the purpose of the processing is scientific research, statistics or archival purposes, the rights may be restricted by the Data Protection Act (1050/2018). Restrictions on rights always require special safeguard measures.

If you have questions about your rights, you can contact the responsible contact person (see above) or the Data Protection Officer (dataskyddsbud@novia.fi) at Novia University of Applied Sciences. See also the overall information on the processing of personal data on the Novia UAS website (<https://www.novia.fi/en/about-us/leading-documents/data-protection/>).

You have the right to lodge a complaint with the data protection authority if you believe that the processing of your personal data is an infringement of the General Data Protection Regulation (GDPR).

Contact information to the data protection authority
Office of the Data Protection Ombudsman
PL 800
00531 Helsinki
+358 29 566 6700 (switchboard)
tietosuoja@om.fi
tietosuoja.fi

APPENDIX: Additional information about a long-term or persistent register, system, or tool

Principles for how the data/register is protected:

The principles for the protection of the personal data registry are based on the categories of personal data that are processed, the legal basis and the processing. Personal data are never processed to a greater extent than necessary. Each employee is responsible for compliance with the principles of data minimization, storage minimization and purpose limitation. When personal data is processed, this should be done in the safest possible way.

Only Novia's personnel have access to Novia Network. User rights are distributed by admin if necessary. User rights are connected to employment, which means that the user rights are deleted when the employment is terminated.

Principles and regulations for storage and storage time:

The predicted deadlines for deleting different categories of data are in accordance with the Archives Act (831/1994), the Act on Information Management in Public Administration (906/2019) and the Novia routine GQAP08.

List of regular data sources (national registers, etc.):

Data is collected within the framework of Novia's activity through Novia's administrative systems (e.g., the study register Peppi) or directly from the registered (e.g., through manual enrollment in events).

Detailed information on automated decision-making:

Decisions are made in Novia Network based on manual settings. If there are any questions, one can always contact Novia Network's contact person at Novia, or the contact person listed for the event.