
PRIVACY NOTICE

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

This notice concerns:

Implementation of the "Erasmus+ Global project KA171-HED Mobility of higher education students and staff" funded by the European Commission. The project is valid until 31.7.2028.

Personal data controller

Novia University of Applied Sciences
Wolffintie 31
65200 Vaasa
Finland
www.novia.fi

Novia University of Applied Sciences (Novia UAS) 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:

International Office, Student Services

Contact person:

Head of Student Services, Jessica Bonde
Jessica.bonde@novia.fi
+ 358 50 472 9655

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?

The project "Erasmus+ Global KA171-HED Mobility of higher education students and staff" is a cooperation project between Novia UAS and University of Zambia (UNZA) in the field of Nursing and Midwifery. Its aims are to develop the global competence and cultural awareness of participants; to compare curricula between Novia UAS and UNZA; and to investigate what nursing and midwifery are from two different cultural perspectives.

The project activities consist of student and teacher mobilities both ways. Students will have the possibility to combine theoretical studies and internships. They might use the experiences gained during practice for their final theses and for writing blog posts. Teachers might use their experience of teaching abroad and counselling own and incoming students for writing articles. The project may also consist of online workshops or sessions.

To be able to conduct the above-mentioned activities the collection and processing of personal data, which are stated below, will be needed.

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

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. Providing degree programmes and education to train professionals are examples of statutory tasks of public interest and official authority.

Clarification

For the implementation of activities such as student and staff exchange, internships, online workshops or sessions, Novia UAS is required to collect some personal data from participants. The data will be collected, processed and stored by the international coordinators.

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

Student and teacher exchange in Zambia

The following personal data will be required from students and teachers from Novia UAS: name, email, telephone number, other contact information, passport photo, passport information (including information such as social security number, passport number, gender), facial image.

The personal data will be processed primarily by the international coordinators and may be accessible by other members of the project. Further personal data may also be processed by the project partner university, particularly the Faculty of Nursing Sciences at University of Zambia (UNZA).

Students' and teachers' personal data will be transferred to and processed in a country without sufficient data protection legislation (Zambia). The personal data may be used in ways not fully aligned with European law. In particular, the Zambian Data Protection Commissioner appears to have broad powers regarding decisions on access to personal data.

Student and teacher exchange in Finland

The following personal data will be required from students and teachers from UNZA: name, email, telephone number, other contact information, passport photo, passport information (including information such as social security number, passport number, gender), facial image.

The personal data will be processed primarily by the international coordinators and may be accessible by other members of the project. Further personal data will also be processed by the International Office at Novia UAS.

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

Personal data such as name, email, telephone number, other contact information, passport photo, passport information (including information such as social security

number, passport number, gender), facial images are collected directly from participants. Since Microsoft services (O365) is the main tool used for collaboration, personal data such as name and email address will be stored in Microsoft services (O365) for the duration of the project. The said personal data will be stored for a period of five years after the submission of the last report to the financier. After this time the data will be deleted.

In addition, we will use the mobility management system SoleMove to collect and process exchange applications and the Beneficiary Module (European Union Database for Erasmus mobilities) to register exchanges. Novia UAS will register students' personal data in the Student register Peppi. Personal data will also be used in the online learning environments and services that Novia UAS provides for students and teachers when conducting education and training activities.

Personal data such as passport photo, passport information, other contact information, social security number, passport number and any information that might be needed for travel booking will be deleted after the travel has ended.

Is your personal data transferred (outside Novia UAS) for processing?

Yes, personal data will be transferred outside Novia University of Applied Sciences.

Personal data such as passport photo, passport information, other contact information, social security number, passport number and any information that might be needed for travel booking will be processed by a travel agency cooperating with Novia UAS.

Since the tools and services at Novia UAS are mainly cloud services (i.e., Microsoft, etc.) personal data may be processed by the service suppliers when using these services. This processing is regulated by adequate agreements between Novia UAS and the suppliers.

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

Student exchange in Zambia

Yes, personal data will be transferred outside Novia University of Applied Sciences.

Personal data such as name, email, telephone number, other contact information, passport number, gender, facial image will be shared with the partner university in Zambia (UNZA) and the NGO(s) or healthcare institution(s) where Novia UAS students will conduct their internship. The data is to be used solely to inform the respective institutions about who the incoming students are.

Is your personal data transferred outside EU/EEA?

Student exchange in Zambia

Yes, personal data may be transferred temporarily outside EU/EEA due to the tools and services being used. For instance, Novia UAS uses Microsoft services for its communication, which is a cloud service that may process data in the US. Microsoft is certified by the EU-US Data Privacy Framework that safeguards transfers to certified US companies.

In addition, as the project involves collaboration with an institution outside EU, personal data such as name, email address, telephone number, passport number and facial image may be shared with UNZA, the partner university in Zambia, and the NGO(s) or healthcare institution(s) where Novia UAS students will conduct their internship. The sharing of personal data is made so that the partner institutions are informed about the incoming students.

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 organisational 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