

(General Data Protection Regulation 2016/679, Sections 13 and 14)

Dear current and previous students of KAMK,

This notice concerns students of Kajaani University of Applied sciences (KAMK). It sets out how we process your personal data and what rights you have to your personal data.

To ensure that we can implement our educational obligations, such as organizing teaching, collecting and maintaining records of studies and qualifications and offering student services, we must process different types of personal data concerning our students. Personal data mean data by which you can be directly or indirectly identified. This form of personal data processing means that you are the data subject and KAMK is the data controller, in other words the organization that controls the processing of your personal data for the purposes above.

For which purposes will	Kajaani University of Applied Sciences processes data
your personal data be pro-	to implement and evidence the study right and to organize teaching,
cessed?/	to manage and maintain statistics of completed studies and degrees,
Why are your personal data	to develop teaching
needed?	to provide student services
	to enable the safety of the students and other members of the university of
	applied sciences' community and the physical safety and data security of the
	study environment
	In addition, the university of applied sciences can process data
	for the purposes of scientific research and
	<ul> <li>study-related marketing communication or other special purposes.</li> </ul>
For what reasons are your	The University of Applied Sciences right to process personal data as the data file
personal data processed?	controller is based on
personal data processed.	compliance with legal obligations
	a task carried out in the public interest and in the exercise of official au-
	thority
	and in certain cases, on the data subject's consent or contractual obliga-
	tions
	tions
	As controller, the University of Applied Sciences has the right to process special
	personal data categories when
	<ul> <li>necessary for reasons of substantial public interest</li> </ul>
	Main statutes
	University of Applied Sciences Act 932/2014 and decrees issued under it
	Act on the Student Admissions File, the Higher Education Achievement Reg-
	ister and the Matriculation Examination Register 1058/1998
	Act on National Study and Qualifications Files 884/2017 (Chapter 5)
	General Data Protection Regulation (EU) 2016/679 and Data Protection Act
	1050/2018
	Act on the Openness of Government Activities 621/1999
	7.60 on the openiess of dovernment Activities 021/1999
What personal data is col-	Kajaani University of Applied Sciences processes the following data categories per-
lected from you?	taining to students:
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	Basic data:



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- Individual identification data (name, personal ID number, student number, national learner number, user ID)
- Background data (such as admissions data, gender, nationality and language(s), home municipality and municipality of residence)
- Contact data (email address, telephone number, postal address)
- Next of kin data
- Foreign passport number

#### Data concerning studies:

- Study right data
- Accomplished qualifications
- Attendance, graduation, resignation/drop-out data
- Studies accomplished (e.g. theses, exam responses and other tasks completed for study assessment purposes) and the grades/ assessment
- Exam and course enrolments and data concerning participation in teaching
- Curriculums and other data related to the supervision of studies
- Practical training data
- Theses publication data
- International student and trainee exchange data
- Duty to pay tuition fees data
- Grant and student financial aid data
- Student feedback data
- Data required for arranging student services, IT and library services provision

#### Data added by the student:

 Students can add personal data, e.g. to the Moodle education platform, to their Microsoft account profile. Such information could be e.g., photos, finterests.

Study data that may contain special personal data categories (sensitive data):

- Data concerning personal study arrangements and study support
- Extension to and reinstatement of the right to study data
- Data concerning investigations and consequences of exceptional study related situations

# Are your personal data submitted to third parties?

KAMK may also use external personal data processors such as systems service companies who process personal data with KAMK's mandate based on a purchase contract.

KAMK only surrenders personal data to external bodies or processes such data for purposes other than originally intended in situations that require it by law.

Kajaani University of Applied Sciences surrenders necessary personal data of students to the following recipients:

- National Supervisory Authority for welfare and Health, Valvira
  - personal data, qualification, start date of degree and graduation date of those graduating in the field of social and healthcare
- Immigration and Police authorities
  - If necessary/by request data concerning foreign degree students to the Immigration authority (Registration of Immigrants Act 1270/1997 § 8.1 section 13)
- Ministry of Education and Culture to the Higher Education Achievement



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Register Virta (University of Applied Sciences Act 932/2014)

- Kainuu Joint Municipal Authority of Social and Health Care/Student health care Vital
  - Data of attending students (name, personal ID number, place of residence, address) (Primary Healthcare Act (661972)) until 31.12.2020
- Finnish Student Health Service (FSHS) from 1.1.2021
  - Personal ID number, name, gender, mother tongue, student number, Type of education, Beginning of study right, Attendances (academic year enrollment, only attending students), University of Applied Sciences, Education rating, Location (campus), Field of education (Laki korkeakouluopiskelijoiden opiskeluterveydenhuollosta 695/2019)
- Kiinteistö Oy Kajaanin Pietari (the company providing the accommodation)
  - Data of exchange students (name, date of birth, gender and email address)
  - Data of international degree students (name, date of birth, gender and email address)
     (The information is disclosed with the student's consent to arrange housing)
- · City of Kajaani
  - information on students liable to pay tuition fees (student group information, surname, first names, start and end date of study right, presence information, date of birth, nationality, email address, phone, information on residence permit, residence permit n, information on arrival in Finland (date), information on whether arriving with family (number of people)
  - information obtained from the student themselves: information on residence permit, information on arrival in Finland (date), information on whether arriving with family (number of people)
     (The information is disclosed for the purpose of arranging Settling-in-Services offered to the student. The disclosure of information is based on the legitimate interest of the data controller.)

In addition, Kajaani University of Applied Sciences can surrender students' personal data:

- on a case by case basis/based on the President's decision for the purposes of scientific research (Act on the Openness of Government Activities Act 621/1999 and Personal Data Act 523/1999)
- in order to comply with the Openness of Government Activities Act
   621/1999 or to fulfill its other legal obligations
- To other higher education providers to process the right to study and to transfer study records for example in cases of teaching cooperation
- To foreign universities also outside the EU and EEA in the implementation of exchange studies and double or combined degree studies or to transfer study records
- Subject to the student's consent, personal data can be surrendered to external bodies for the purposes of marketing communication and other special purposes

The source of surrendered data is mainly the Peppi student data system and the SoleMove mobility system. Permanently stored student data and data concerning





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	periods of mobility pertaining to student mobility are transferred to the National Higher Education Achievement Register, Virta.
Are your personal data summitted/transferred to outside the EU or EEA?	Personal data is also surrendered to foreign universities outside the EU and EEA to implement exchange, double or combined degree studies or to transfer academic records.
	Kajaani University of Applied Sciences exercises special caution when personal data is transferred to countries outside the EU and EEA, which do not offer data protection complying with the EU Data Protection Regulation. The transfer of personal data to outside the EU and EEA is executed in compliance with the obligations of the Data Protection Regulation.
For how long are your personal data retained?	The storage periods for personal data saved in systems and manual data are based on the law and KAMK's Data Management Plan.
	Permanent storage (Act 884/2017 §25 and 27)
	learner number and personal ID number or other equivalent individual identification data;    The second of th
	<ul> <li>data concerning the degree qualifications and specialization studies ac- complished by an individual and of all his/her courses/study modules and grades awarded for each of them</li> </ul>
	<ul> <li>data concerning an individual's right(s) to study for a degree and to accomplish specialization studies, as well as data concerning the acceptance of the study place and registering to complete studies leading to a degree qualification or specialization studies</li> </ul>
	In addition, other personal data pertaining to the student can be stored permanently with the agreement of the National Archives of Finland.
	Other than permanently stored personal data, usually:
	<ul> <li>Course and exam enrollments are stored for at least 2 years</li> <li>Study records are stored for at least 6 months</li> </ul>
	<ul> <li>Other than permanently stored data concerning study processes are stored until the student graduates or alternatively for at least five (5) years.</li> <li>Sensitive data are stored for as long as is necessary, at the most for 4 years Storage periods may change in certain cases and storage periods can be revised.</li> </ul>
Is it compulsory to provide all of the information demanded?	Each student shall provide the required personal data and is responsible for the validity and accuracy of their personal data. The provision of personal data is a compulsory requirement in the section "For which purposes will your personal data be processed?/Why are your personal data needed?"
Origin of personal data (concerns situations	Data concerning students is gathered directly from the following information sources:
whereby your personal data has been gathered	National register of applicants, Opintopolku, maintained by the National Agency for Education
from somewhere other than yourself)	National registration for studies and for semester system: the 'OILI' register maintained by the National Agency for Education
	<ul> <li>Data given by applicants on application forms gathered from application processes not organized by Opintopolku</li> </ul>





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	<del>,</del>
	The data can also originate from using IT services and devices that the university of applied sciences offers its students, or from control and surveillance services used by the university of applied sciences (e.g. camera surveillance).
Are the data used for automated decision-making or profiling?	Surrendered personal data is not used for automated decision-making nor for profiling.
What rights do you have	When you wish to check your personal data
when we process your personal data?	You are entitled to check what information the personal data is being processed by KAMK includes and thereby verify that the data and information are correct.
	You can submit a verification request using the <u>Data Verification Request form</u> or by contacting the controller's contact person (see the section Contact person for the data files controller).
	When you wish to correct your personal data
	You have the right to demand that erroneous or inaccurate personal data be rectified or that incomplete data be supplemented by providing further information.
	You can inform the data controller's contact person (see the section Contact person for the data files controller) of the errors that you notice in the data file and request that this information be corrected.
	When you wish to transfer your data to another controller In certain cases you have the right to acquire the personal data you have submitted to the controller and transfer the said data to another controller.
	You have the right to transfer this data if the processing of your personal data is based on your given consent or an agreement between you and the controller and that the data has been digitally processed.
	When you object to the processing of your personal data In certain situations you have the right to restrict the processing of your personal data. In certain situations you may also prevent the processing of your personal data, if you do not want your personal data to be used.
	You have the right to request the removal of data when your personal data is no longer needed for the purposes for which they were originally gathered or otherwise processed, or you have withdrawn your consent and there is no other legal basis for the use of your personal data.
	This right does not apply to legally mandatory data files and registers. It is not possible to remove data from such files while they are being used to accomplish tasks required by law.
	Have you been affected by automated decision-making? You have the right not to be targeted by digitally automated decision-making.





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	Automatic decision-making is permitted, if
	• the decision is necessary for the purposes of making or implementing an
	agreement between you and the controller
	the decision has been approved according to the laws applied to the data file
	controller
	it is based on your specific consent.
	Right to withdraw consent
	You have the right to withdraw your consent for the processing of you personal
	data at any time. Withdrawing consent will not affect the legality of processing
	implemented before consent is withdrawn.
	Right to lodge a complaint with the supervisory authority
	You have the right to lodge a complaint with the Data protection Officer, if you
	consider that the processing of personal data relating to you infringes data protec-
	tion legislation. Data protection officer's office: PL 800, 00521 Helsinki. Telephone
	exchange: 029 566 6700. Email (records): tietosuoja(at)om.fi
What should you do when	If you wish to use the aforementioned rights, contact the person indicated in the
you wish to use your rights?	section 'Contact person for the data files controller'.
	Verification of identity
	The controller has the duty to verify the identity of persons registered in the data
	files. The controller can request the submission of information needed to confirm
	identification.
Data files controller	Name:
	Kajaanin Ammattikorkeakoulu Oy
	Address:
	PL 52, 87101 Kajaani
	Other contact information (phone number, email address):
	kajaanin.amk@kamk.fi
Data files control manager	Director of Study and Communication Services Teija Sievänen
	PL 52, 87101 Kajaani
	Puh. 044 7101 237, teija.sievanen(ät)kamk.fi
Contact person for the data	Name:
files controller	Study and Communication Services, Head of Student Affairs Henna Huusko
	Address:
	PL 52, 87101 Kajaani
	Puhelin: Sähköposti:
	040 352 9091 henna.huusko@kamk.fi
Data Protection Officer	Name:
	Data Protection Officer, Kajaanin Ammattikorkeakoulu Oy
	Address:
	PL 52, 87101 Kajaani
	Email:
	tietosuojavastaava@kamk.fi