

PRIVACY NOTICE
CONTINUOUS LEARNING / LUT
UNIVERSITIES
EU's General Data Protection Regulation
(2016/679),
Articles 13 and 14
Date: 20 October 2022
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1. Data controller

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2. Data controller's representative and contacts

Data controller's representative:
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Data controller's contacts:
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Marketing Communications Specialist Sonja Airikka
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3. Data protection officer

Name: Legal Counsel Anne Himanka

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4. Purpose of personal data processing

The purpose of the direct marketing data file for continuous learning at LUT Universities (LUT University and the LAB University of Applied Sciences) is to communicate about LUT Universities' continuous learning courses and services to customers and other stakeholders. The data file includes those who have subscribed to the LUT Universities' continuous learning newsletter and given their consent to marketing.

5. Legal basis of personal data processing

The data processing is based on the data subject's consent (e.g., newsletter subscription or other request to join the direct marketing data file for continuous learning) or the data controller's legitimate interest (adding key stakeholders to the mailing list).

6. Content of data file and storage period

The data subject's name and email address, and depending on the case, the data subject's employer or other organisation, phone number, or training-related interests.

The data will be stored for as long as necessary for continuous learning activities or until the person unsubscribes from the newsletter.

7. Information systems employed

The LUT Universities' direct marketing data file for continuous learning employs the information systems Campaign Monitor (newsletter tool) and Lyyti (contact requests and registrations).

8. Data sources

Data is mainly provided by the data subjects themselves (newsletter subscriptions, requests to join the continuous learning direct marketing data file). Data is also collected from public-access information resources, such as online services of stakeholder organisations.

9. Use of cookies

Browser-based filing information systems employ cookies to process personal data. A cookie is a small text file that the browser saves on the user's device. Cookies are used to implement services, facilitate login, and enable the compilation of statistics on services. Users may prevent the use of cookies in their browsers, but this may prevent the system from operating properly.

10. Data transfer and disclosure

Normally, no personal data is disclosed to parties beyond the organisation. Communications, marketing and data processing may be supported by external actors who have agreed to be bound by the EU's data protection legislation.

Personal data may be transferred or disclosed for marketing and communications purposes if the data subject has consented to it.

11. Data transfer and disclosure beyond the EU or EEA

Normally, no data is transferred beyond the EU or EEA. However, communications and marketing services may involve actors and servers in third party countries. In such cases, data may also be transferred beyond the EU or EEA in accordance with prevailing

legislation. Campaign Monitor stores data on servers that may be located beyond the EU or EEA.

12. Safeguards for data processing

Only those whose professional duties so require have access to systems containing personal data (e.g., email recipient lists, newsletter tool). Information security is ensured appropriately in accordance with the university's information security practices. No printouts or other forms of data that require physical safeguarding exist.

13. Automated decision-making

No automated decision-making takes place in the data processing.

14. Rights of the data subject

Data subjects have the right to withdraw their consent if the data processing is based on consent.

Data subjects have the right to lodge a complaint with the data protection ombudsman if the subjects consider that the data processing regarding them is in breach of data processing legislation in force.

Data subjects have the following rights under the EU's General Data Protection Regulation:

- a) Right of access to data concerning the data subject (article 15)
- b) Right to rectification of data (article 16)
- c) Right to erasure of data (article 17); the right to erasure shall not apply if processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure prevents or significantly hinders the data processing
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20)

The data subject's rights involving the processing of personal data may be restricted in accordance with the EU's General Data Protection Regulation.

The liaison in matters related to the data subject's rights is the data protection officer; contact details in section 3.