

**PRIVACY NOTICE**  
**Online service lutuniversities.fi**  
**EU's General Data Protection Regulation**  
**(2016/679),**  
**Articles 13 and 14**  
**Date: 26 April 2022**  
**Updated: 13 December 2023**

### **1. Data controller**

Lappeenranta–Lahti University of Technology LUT

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Email: [info@lut.fi](mailto:info@lut.fi)

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Yliopistonkatu 34  
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Finland

Lahti campus  
Mukkulankatu 19  
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### **2. Data controller's representative and contacts**

Data controller's representative:  
Director of Study Affairs Maija Kuiri  
Phone: +358 40 512 7425  
Email: [majja.kuiri@lut.fi](mailto:majja.kuiri@lut.fi)

Data controller's contacts:  
Continuous Learning Manager Miia Vanhainen  
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Marketing Communications Specialist Sonja Airikka  
Phone: +358 50 346 1324  
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### **3. Data protection officer**

Name: Legal Counsel Anne Himanka  
Address: LUT University, Yliopistonkatu 34, 53850 Lappeenranta, Finland

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#### **4. Purpose of personal data processing**

The purpose of personal data processing related to the online service lutuniversities.fi is to maintain and develop the continuous learning web pages of LUT Universities (LUT University and the LAB University of Applied Sciences), to improve the user experience and functionality of the web pages and to maintain and develop their content. The online service uses cookies to implement its functions and analyse user data, and identification data may be collected for remarketing purposes.

The online service form at lutuniversities.fi may also be used to collect personal data for communications and marketing purposes with the express consent of the data subject.

#### **5. Legal basis of personal data processing**

Personal data is processed only when it is necessary for the use of the service or when consent has been given by the data subject. The data controller has a legitimate interest to process personal data in order to monitor and analyse website traffic, develop the website contents, and if needed, target marketing. The data controller also has grounds for data processing if data subjects give their consent by, for instance, subscribing to the newsletter.

#### **6. Content of data file and storage period**

The data collected from the online service include the data subject's IP address, location data, device, browser application, browsing history in the online service, and other data disclosed by the data subject and collected with a separate form. The data will be stored for as long as needed for the data controller's activities.

#### **7. Information systems employed**

Google services are used for analysing and developing the website and the use of its parts. Data collected with these tools are not connected to personal data. The production and maintenance of the online service involves partners that can access personal data to the extent defined in this privacy notice.

#### **8. Data sources**

Data is collected from the use of the online service or disclosed by the data subjects. In addition, identification data such as social media tracking pixels can be used to target marketing.

#### **9. Use of cookies**

The online service lutuniversities.fi uses cookies. A cookie is a small text file that the browser saves on the user's device. Cookies are used to ensure the functionality of the website, implement and develop services, target marketing, and compile statistics on the service. Users may prevent the use of cookies on their browser, but this may affect the functionality of the online service.

#### **10. Data transfer and disclosure**

Normally, no personal data is disclosed to parties beyond LUT Universities. The online service and data processing are supported by external actors who have agreed to be bound by the EU's data protection legislation.

Website visitor data may be transferred or disclosed for marketing and communications purposes if the data subject has consented to it. External communications and marketing service providers have agreed to be bound by the EU's data protection legislation.

## **11. Data transfer and disclosure beyond the EU or EEA**

Normally, no data is transferred beyond the EU or EEA. However, the online services may involve actors and the use of servers in third party countries. In such cases, data may also be transferred beyond the EU or EEA in accordance with prevailing legislation. Google stores visitor tracking data on servers that may be located beyond the EU or EEA.

## **12. Safeguards for data processing**

The processing of personal data is restricted by user rights, and only employees whose job descriptions so require have access to systems that contain personal data. 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.*