

EU's General Data Protection Regulation (EU 2016/679), Articles 12–14

Privacy Notice

1. Controller	Hanken School of Economics
	Hanken School of Economics Arkadiankatu 22 00100 Helsinki Finland Business ID: FI02459077
2. Contact person for issues related to the register	Manager, Career Services Susanna Paul Tel. +358 (0) 40 3521 539 Email: susanna.paul@hanken.fi
3. Data protection officer	Victoria Sandberg dpo@hanken.fi
4. Name of the register	Register for career monitoring surveys at Hanken School of Economics for graduates with a master's degree or discontinued bachelor's degree and for graduates with a doctor's degree.
5. Purpose of processing personal data and legal grounds for processing	The purpose of career monitoring surveys is to monitor the early career stages of university graduates and their situation in the labour market (five years for higher university degree graduates or discontinued bachelor's degree programme graduates, for example, nursery school teachers and pharmacists, and three years for doctors) and utilise the monitoring information in research, highlighting the early career stages of people with an academic education, the development of higher education and student guidance, as well as for offering information for potential students, current students and graduates for planning their own studies and career. In the career monitoring survey, this information is produced and used without identification information about the participants. This information is university-specific, for cooperation between the universities, with cooperation partners and generally for research through the Finnish Social Science Data Archive (FSD). Grounds for processing: Duties in accordance with public interest (evaluation and development of university education (sections 2 and 87 of the Universities Act (2009/558)) and production of related statistics). Decree of the Ministry of Education and Culture on Calculation Criteria for University Core Funding (119/2019)
6. Data content of the register	The career monitoring survey is conducted both in paper and electronic surveys. The electronic survey is conducted within the Education Management Information Service ARVO (Finnish National Agency for Education), which is maintained and developed by CSC (IT Center for Science Ltd). The data collection on paper survey and the gathering of the data is coordinated by TUPA (statistical research service of the University of Tampere). The register contains identification and background information as well as

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	survey responses that CSC and TUPA gather on behalf of Hanken School of Economics. The information includes: a) Form identifier/code of electronic response, response time b) Identification information that is not saved with the responses and which is solely used for administration of the target group and postage and gathering of background information. - First name, last name, personal identification number, possible date of death - Address, postal code, phone number - Student number/student identification number c) Background information that is saved together with the survey responses - Information related to the right to study and the degree completed in question, such as the level of the degree, discipline, year of admission and graduation, tuition-fee liability, the grade and grading scale of the thesis, and information related to the respondent, such as gender, age, nationality and native language. d) Respondents who wish to receive additional information about where the results are published can provide their email address while responding to the survey. The email address is saved separately from the survey's responses in the register of Hanken School of Economics.
7. Regular data sources	The background and identification information of the group of respondents will be gathered by CSC in a centralised manner from the national VIRTAS study information service and, in supplementary parts, from the student information systems of universities (study subject, faculty). Address data will be supplemented using the Population Information System, and the telephone number will be acquired from the consumer information of the Suomen Asiakastieto Oy Service database. Email addresses are from Hanken School of Economics' alumni database. The respondents can fill in a paper survey or an electronic online survey. TUPA registers the paper survey responses and CSC registers the electronic survey responses in the ARVO database. TUPA will gather both the paper and electronic survey responses in the register and combines with the background information. TUPA will also combine the register of Hanken School of Economics to a national register by collecting the responses of all individual universities that oversee their individual registers. They are the following: Helsingin yliopisto, Itä-Suomen yliopisto, Jyväskylän yliopisto, Lapin yliopisto, Oulun yliopisto, Turun yliopisto, Vaasan yliopisto, LUT-yliopisto, Åbo Akademi, Taideyliopisto, Aalto-yliopistona toimiva Aalto-korkeakoulusäätiö; Tampereen yliopistona toimiva Tampereen korkeakoulusäätiö

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8. Regular data transfers and recipient groups	The processing of the register's personal data has been partly outsourced with a subcontract agreement: ☐ No ☒ Yes; further information about outsourced processing: Based on subcontracting by Hanken School of Economics, the register is processed by TUPA, statistical research service of the University of Tampere, and CSC - IT Center for Science Ltd. CSC - IT Center for Science Ltd selects the target group, enriches the contact information, creates the survey links, and collects the online answers, as well as combines the material for reporting. CSC processes direct personal data during data collection and the survey data without the direct data when reporting the results. CSC discloses the personal data (contact information, background information and survey IDs) to TUPA so the survey and reminders can be sent and for analysis of the data. TUPA, statistical research service of the University of Tampere, coordinates the implementation of career monitoring and processes personal data in order to send the survey and for analysing and reporting purposes. TUPA discloses university-specific data to each university, to Aarresaari, career service network of Finnish Universities and to CSC for national reporting of national survey data. The data can be disclosed according to the contract of Hanken School of Economics to collaboration partners (such as professional associations) for research purposes, excluding any personal data from which data subjects can be directly identified. In addition, data is also disclosed, without any identifiable personal data, to the Finnish Social Science Data Archive (FSD) for archiving and more detailed anonymisation for later research use. The data will be reported publicly so that no single individual can be identified from the results.
9. Transfer of data outside the EU or EEA	Will registered data be transferred to a third country or an international organisation outside the EU or EEA? ☒ No ☐ Yes, please specify:
10. Register protection principles	The survey forms that are returned by respondents in paper format are posted directly to TUPA for registration. After registration the paper forms are destroyed. The data in digital format is deleted by TUPA ten years of the digital registering.
11. Retention period for personal data or specification criteria for the retention period	Identification information enabling the identification of respondents is retained in the register only until data is combined and later destroyed after the data has been processed. Hanken School of Economics will retain data from different years without any direct identification information for the purpose of compiling time series for ten

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	years. TUPA and CSC will retain data without any direct identification information for ten years based on subcontracting by Hanken School of Economics and Hanken School of Economics will retain the data with identification as a part of its sub-register for a maximum of five years. The data will be stored in the Finnish Social Science Data Archive (FSD) anonymously, which means that it cannot be linked to individual people.
12. Information about the existence of automated decision-making or profiling and information about the logic of processing and its significance for data subjects	The registered data will be used for automated individual decisions, including profiling: ☒ No ☐ Yes, please specify:

13. Rights of data subjects	Under the EU's General Data Protection regulation (EU 2016/679), data subjects have the right to view their data, have their data rectified or erased, have the processing of their data restricted, object to the processing of their personal data, as well as the to lodge a complaint with the supervisory authority. - <u>Right to view data (right of access to personal data)</u> - o Data subjects have the right to know whether their personal data has been processed and what personal data concerning them has been recorded. - <u>Right to have data rectified</u> - o Data subjects have the right to claim that any erroneous, inaccurate, or incomplete personal data be rectified or completed without undue delay. Furthermore, data subjects have the right to demand the erasure of any unnecessary personal data. - <u>Right to have data erased</u> - o In irregular situations, data subjects have the right to have their personal data erased from the controller's register (right to be forgotten). - <u>Right to restrict processing</u> - o In certain situations, data subject has the right to request that the processing of their personal data be restricted until their data has been appropriately inspected and rectified or completed. - <u>Right to object</u> - o Data subjects have the right, on grounds relating to their particular situation, to object to the processing of their personal data at any time. Requests to exercise the rights of data subjects must be sent to the university to Data protection office Victoria Sandberg.
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	- <u>Right to lodge a complaint with the supervisory authority</u> - o Data subjects have the right to lodge a complaint with the supervisory authority of their permanent place of residence or employment, if they consider that the processing of personal data is in breach of the GDPR (EU 2016/679). In addition, data subjects have the right to use administrative means of change management and other legal protection. Contact information: Office of the Data Protection Ombudsman PL 800, 00531 Helsinki Email: tietosuoja@om.fi
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