

Haaga-Helia University of Applied Sciences Privacy Notice for Student Welfare Services

In compliance with the requirements of the EU General Data Protection Regulation (GDPR, Articles 13, 14 and 30)

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1. Controller of data file

The controller of the data file is Haaga-Helia University of Applied Sciences Ltd (Business ID 2029188-8).

Ratapihantie 13

00520 Helsinki, Finland

2. Controller's contact persons

Sirpa Helenius, Psychiatric Nurse

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Heikki Ursin, Special Education Teacher

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3. Controller's data privacy officer

Teija Aarnio

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Requests concerning the exercising of the data subject's rights should be addressed to the controller's data privacy officer.

4. Name of data file

Haaga-Helia data file for student welfare services.

5. Purpose of processing of personal data

Personal data are processed in relation to the controller's student welfare functions, which include the services of a psychiatric nurse, a student psychologist and special education teachers. The purpose of the services is to promote the progress of students' studies, as well as students' wellbeing and psychological coping ability.

The controller processes the data in house, as well as subcontracting parties to process the data on the controller's behalf.

6. Lawfulness of processing of personal data

6.1. The lawfulness of processing personal data is based on the following principles of the EU General Data Protection Regulation:

- a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes (GDPR Art. 6 (1)a), or, in the case of special categories of personal data, the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in the regulation may not be lifted by the data subject (GDPR Art. 9 (2)a);
- b) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (GDPR Art. 6 (1)f).

The aforementioned legitimate interests of the controller are based on a meaningful and appropriate relationship between the data subject and the controller, which arises when the data subject is a student in the controller's establishment, as long as the processing is done for purposes which the data subject can reasonably be assumed to have expected at the time of, and in conjunction with, the data being collected.

7. Content of data file and personal data categories processed

7.1. Personal data categories

- a) Student details
- b) Details of studies
- c) Reasons for contacting welfare services
- d) Data generated during customer relationship
- e) Statements
- f) Medical certificates or equivalent

7.2. For each data category, the data file contains the following personal data, considered legitimate (the list is not exhaustive, and not all of the data listed is necessarily present for every data subject):

- a) Student details
 - Name
 - Personal ID
 - Student ID
- b) Details of studies
 - Start date of studies
 - Degree programme
 - Progress of studies (ECTS credits)
- c) Reasons for contacting welfare services
 - Method of arrival (booking made personally or referral)
 - State of health, including description of symptoms
 - Symptom history
 - Treatment history
 - Life history
 - Family background
- d) Data generated during customer relationship
 - Monitoring of health
 - Plan for future treatment during or after customer relationship
 - Summary of information if student is referred to another place of treatment
- e) Statements

- Freely formed medical statements on request by student
 - Statement: Special arrangements required by student
 - Statements for other official authorities, if required by Criminal Code or Child Welfare Act
- f) Medical certificates or equivalent (if supplied by data subject)

8. Regular data sources and personal data generated as part of controller's operations

Personal data are primarily collected from the data subjects themselves. Additionally, the controller collects personal data that is generated during the provision of the controller's welfare services, as well as data related to studies from the controller's student records.

9. Period of storage of personal data

The duration of storage of personal data complies with possible statutory requirements. The personal data in the data file are stored for as long as and to the extent that each category of data is needed, proportionate to the purpose of processing of the personal data.

10. Regular disclosures of personal data

Personal data from the file are disclosed to the following third parties:

Official authorities or similar parties who have a legal basis for receiving data from the data file if necessary, in the fashion required and permitted by law. These include, for example, the Police and the child welfare authorities.

11. Transfers and disclosures of data to outside of the EU or EEA

Data from the data file are not transferred outside of the EU or EEA, nor processed from outside of the EU or EEA.

12. Data security principles

Only the controller is entitled to access databases and systems and to use the data file. Every user of the data file has an individual username and password for the systems.

Materials containing personal data are stored in locked facilities that may only be accessed by specifically appointed persons whose work duties entitle them to do so.

The database containing personal data is stored on a server which is placed in a locked facility that may only be accessed by specifically appointed persons whose work duties entitle them to do so. The server is protected by an appropriate firewall and technical security systems.

13. Rights of the data subject

The data subject has the following rights in accordance with the EU General Data Protection Regulation:

- 1) The right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
 - i) the purposes of the processing;
 - ii) the categories of personal data concerned;
 - iii) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
 - iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - v) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 - vi) the right to lodge a complaint with a supervisory authority;
 - vii) where the personal data are not collected from the data subject, any available information as to their source; and
 - viii) the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. (GDPR Art. 15)

Additionally, the data subject has the following rights:

- 1) The right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. (GDPR Art. 7)
- 2) The right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her, as well as the right to have incomplete personal data completed, including by means of providing a supplementary statement. (GDPR Art. 16)

- 3) The right to obtain from the controller the erasure of personal data concerning him or her without undue delay, where one of the following grounds applies:
 - i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - ii) the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
 - iii) the data subject objects to the processing on grounds relating to his or her particular situation, and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes;
 - iv) the personal data have been unlawfully processed;
 - v) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject. (GDPR Art. 17)

- 4) The right to obtain from the controller restriction of processing, where one of the following applies:
 - i) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - iii) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
 - iv) the data subject has objected to processing on grounds relating to his or her particular situation, pending the verification whether the legitimate grounds of the controller override those of the data subject. (GDPR Art 18)

- 5) The right to receive the personal data concerning him or her, which he or she has provided to the controller, in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to the GDPR, and the processing is carried out by automated means. (GDPR Art. 20)

- 6) The right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data relating to him or her infringes the GDPR. (GDPR Art. 77)

Requests concerning the exercising of the data subject's rights should be addressed to the controller's data privacy officer.