



This privacy statement is based on the obligation to provide data subjects with information under Articles 12–14 of the GDPR (**EU General Data Protection Regulation 2016/679**), the obligation of the controller to maintain records on the processing activities under its responsibility under Article 30 of the GDPR and the obligations stipulated in the Finnish Data Protection Act supplementing the GDPR (1050/2018).

In addition, the objective has been to align this privacy statement with the requirements of the **EU Accessibility Directive and the Finnish Digital Services Act** supplementing the Directive (Directive of the European Parliament and of the Council on the accessibility of the websites and mobile applications of public sector bodies (2016/2102); Act on the Provision of Digital Services (306/2019).

25 November 2022

<p><b>1 Name of the register</b></p>	<p><b>Processing of personal data in 3AMK learning activities</b></p>
<p><b>2 Joint controllers</b></p>	<p>Names of joint controllers:</p> <p><b>Haaga-Helia University of Applied Sciences Ltd</b> (business ID: 2029188-8)  <b>Laurea University of Applied Sciences Ltd</b> (business ID: 1046216-1)  <b>Metropolia University of Applied Sciences Ltd</b> (business ID: 2094551-1)</p> <hr/> <p>Contact details of joint controllers:</p> <p><b>Haaga-Helia University of Applied Sciences Ltd (business ID: 2029188-8)</b>          Visiting address: Ratapihantie 13, FI-00520 Helsinki          Telephone (switchboard): +358 9 229 611          Email (registry): <a href="mailto:kirjaamo@haaga-helia.fi">kirjaamo@haaga-helia.fi</a></p> <p><b>Laurea University of Applied Sciences Ltd (business ID: 1046216-1)</b>          Postal address: Ratatie 22, FI-01300 Vantaa          Visiting address: Ratatie 22, FI-01300 Vantaa          Telephone (switchboard): + 358 9 8868 7150          Email: <a href="mailto:rehtorintoimisto@laurea.fi">rehtorintoimisto@laurea.fi</a></p> <p><b>Metropolia University of Applied Sciences Ltd (business ID: 2094551-1)</b>          Postal address: P.O. Box 4000, FI-00079 Metropolia          Visiting address: Myllypurontie 1, FI-00920 Helsinki          Telephone (switchboard): +358 9 7424 5000          Email (registry): <a href="mailto:kirjaamo@metropolia.fi">kirjaamo@metropolia.fi</a></p>

	<p><b>Contact person for the processing of personal data (Haaga-Helia University of Applied Sciences):</b>  Name: Airi Hirvonen  Assignment: Head of Student Affairs  Address: Haaga-Helia Ammattikorkeakoulu Oy, Ratapihantie 13  FI-00520 Helsinki  Email: <a href="mailto:airi.hirvonen@haaga-helia.fi">airi.hirvonen@haaga-helia.fi</a></p> <p><b>Contact person for the processing of personal data (Laurea University of Applied Sciences):</b>  Name: Päivi Aho  Assignment: Development Manager  Address: Laurea University of Applied Sciences Ltd, Ratatie 22, 01300 Vantaa, Finland  Email: <a href="mailto:paivi.aho@laurea.fi">paivi.aho@laurea.fi</a></p> <p><b>Contact person for the processing of personal data (Metropolia University of Applied Sciences):</b>  Name: Tapio Rimpioja  Assignment: Head of Student Affairs  Address: Metropolia University of Applied Sciences Ltd, P.O. Box 4000, FI-00079 Metropolia  E-mail address: <a href="mailto:tapio.rimpioja@metropolia.fi">tapio.rimpioja@metropolia.fi</a></p>
<p><b>3 Data protection officers</b></p>	<p><b>Data protection officers:</b></p> <p><b>Haaga-Helia University of Applied Sciences Data Protection Officer, Ilkka Valve</b>  E-mail address: <a href="mailto:tietosuojavastaava@haaga-helia.fi">tietosuojavastaava@haaga-helia.fi</a></p> <p><b>Laurea University of Applied Sciences Data Protection Officer, Marjo Valjakka</b>  E-mail address: <a href="mailto:marjo.valjakka@laurea.fi">marjo.valjakka@laurea.fi</a></p> <p><b>Metropolia University of Applied Sciences Data Protection Officer, Riikka Ikäheimonen</b>  E-mail address: <a href="mailto:tietosuojavastaava@metropolia.fi">tietosuojavastaava@metropolia.fi</a></p>

<p><b>4 Purposes of processing personal data and legal basis for processing</b></p>	<p><b>Purpose of processing personal data:</b></p> <p>3AMK is a strategic alliance of the three largest universities of applied sciences in the Helsinki metropolitan area: the Haaga-Helia University of Applied Sciences, Laurea University of Applied Sciences and Metropolia University of Applied Sciences. The purpose of the Personal data register for 3AMK teaching and learning excellence and the information contained therein is to carry out collaboration between the universities of applied sciences in the 3AMK alliance.</p> <p>In connection with the implementation of 3AMK teaching and learning collaboration, the universities of applied sciences process personal data in such a way that a joint controllership is formed between the parties in the manner laid down in Article 26 of the GDPR (EU General Data Protection Regulation 2016/679).</p> <p>For the sake of clarity, it must be noted that, in connection with the implementation of the 3AMK teaching and learning collaboration, the universities of applied sciences also process personal data as separate controllers. With regard to this independent processing of personal data, each university of applied sciences is responsible for the processing of data in accordance with its own data protection principles, current data protection legislation and the description given in the privacy statement of the student and study data register of each university of applied sciences.</p> <p><b>Legal basis for processing personal data:</b></p> <p>The processing of data in the personal register of 3AMK learning activities is partly based on the use of public authority.</p> <p>The processing of data in the personal register of 3AMK learning activities is partly based on compliance with the statutory obligation.</p> <ul style="list-style-type: none"> <li>○ Universities of Applied Sciences Act 2014/932</li> </ul> <p>The processing of data in the personal data file for 3AMK learning activities may be based on the public interest.</p>
<p><b>5 Legitimate interests of the controller or third party</b></p>	<p>The legal basis for the processing of data in the Personal data register for 3AMK teaching and learning excellence does not constitute a “legitimate interest”. Therefore this section does not apply.</p>

<p><b>6 Description of data subject groups and personal data groups</b></p>	<p>The data subjects of the Personal data register for 3AMK learning activities are the students and employees of Haaga-Helia University of Applied Sciences, Laurea University of Applied Sciences and Metropolia University of Applied Sciences.</p> <p>The following personal data is stored in the Personal data register for 3AMK learning activities:</p> <p>The students of Haaga-Helia University of Applied Sciences, Laurea University of Applied Sciences and Metropolia University of Applied Sciences and continuous learning students can select study units or more extensive learning lanes from the joint offering of 3AMK. The studies can be included in compulsory or elective studies.</p> <p>The student registers using an electronic form and provides the information listed below, which is transferred to the student administration systems of each University of Applied Sciences.</p> <p>Finnish social security number  First names  Family name  Gender  Telephone number  Language of communication  Native language  Home municipality  Nationality  Street address  Postal code  Postal city  Email address (use the email address you have at your own UAS)</p>
<p><b>7 Regular sources of personal data</b></p>	<p>Personal data has been obtained from the data subjects themselves or in connection with the HAKA login.</p>
<p><b>8 Recipients or groups of recipients of the data and regulatory transfers</b></p>	<p>The data contained in the personal register of 3AMK learning activities is transferred to the student administration of each University of Applied Sciences for processing in accordance with the processes of each University of Applied Sciences. The processing of personal data is described in the privacy statements of each University of Applied Sciences.</p>

<p><b>9 Transfer of data to countries outside the EU or EEA or to international organisations</b></p>	<p>As a rule, personal data contained in the Personal data register for 3AMK teaching and learning excellence are not transferred outside the EU or EEA or to international organisations.</p> <p>The personal data contained in the personal data register may be transferred outside the EU or the EEA in order to provide IT services necessary for the performance of work or studies, based on case-by-case consideration. The destination of said transferred data is the United States. It is also possible that some personal data is transferred to India, as India produces the Helpdesk services / ICT user support widely used by global ICT service providers.</p> <p>The international transfer of personal data to the United States and/or elsewhere outside the EU/EEA will be secured primarily by means of the safeguards set out in Chapter V, Article 46 of the GDPR, i.e. the so-called Standard Contractual Clauses (SCC).</p> <p>Only necessary data is transferred, and transfers are carried out in accordance with and within the limits of data protection legislation. The security and data protection of transfers are always agreed separately.</p>
<p><b>10 Personal data retention period</b></p>	<p>The personal data collected in the Personal data register for 3AMK teaching and learning excellence and personal data processed within the scope of the register are retained in the register as follows:</p> <p><b>Data in the Personal data register for 3AMK excellence:</b></p> <p>The registered student's personal and study data will be stored for the purpose of use, however, for at least six (6) months after the end of registration. The Act on the National Registers of Education Records, Qualifications and Degrees (884/2017) regulates the retention of a student's personal and study data and performance records.</p> <p>The following regulations have been taken into account when determining the retention period:</p> <ul style="list-style-type: none"> <li>- <a href="#">Act on the National Registers of Education Records, Qualifications and Degrees (2017/884)</a></li> <li>- <a href="#">EU General Data Protection Regulation</a> ("GDPR", 2016/679)</li> <li>- <a href="#">Data Protection Act (2018/1050)</a></li> <li>- <a href="#">Act on Universities of Applied Sciences (2014/932)</a></li> <li>- <a href="#">National Archives decision on retention periods – decision concerning universities of applied sciences (AL/20757/07.01.01.03.02/ 2016)</a></li> </ul>

**11  
Rights of data  
subjects**

The data subject has the right to obtain confirmation from the controller on whether personal data concerning them are processed. In addition, the data subject has the right of access to the personal data concerning the data subject and the right to check and obtain copies of the data concerning them stored in the register. In accordance with the GDPR, the controller must reply to a request for the fulfilment of the data subject's rights without delay, but no later than one month of receiving the request.

The data subject may submit a request for their rights under the General Data Protection Regulation in accordance with the practices of their home University of Applied Sciences. When submitting a request, the data subject must prove their identity in a reliable manner.

**A. Right of access to personal data**

The data subject has the right to check the data concerning them stored in the Personal data register for 3AMK teaching and learning excellence.

**B. Right to rectification and restriction of processing**

The data subject has the right to have the controller restrict processing in the case of one of the following:

- the accuracy of the personal data is contested by the data subject (right to rectification), in which case processing is restricted for a period, enabling the controller to verify the accuracy of the data;
- the processing is unlawful and the data subject opposes the erasure of their personal data and requests the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing but the data subject needs them for the establishment, exercise or defence of legal claims.

**C. Right to erasure**

The data subject has the right to have the personal data concerning them removed from the Personal data register for 3AMK teaching and learning excellence without undue delay, provided that one of the following is fulfilled:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the personal data have been unlawfully processed; or
- 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.

	<p><b>D. Right not to be subjected to a personal data breach</b>  The data subject has the right not to become the subject of a personal data breach referred to in Article 33 of the GDPR where the breach is based on negligence of data protection and/or data security by the controller or negligence of data protection and/or data security by a processor of personal data used by the controller. The data subject has the right to be informed without undue delay if the personal data breach is likely to pose a high risk to the rights and freedoms of natural persons.</p> <p><b>E. The data subject's right to object</b>  In accordance with Article 21 of the GDPR, the data subject has the right to object, on grounds relating to their particular situation, to processing of personal data concerning them which is based on point (e) of Article 6(1) (processing is necessary for the performance of a task carried out for reasons of public interest), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</p>
<p><b>12 Right to lodge a complaint with the supervisory authority</b></p>	<p>The data subject has the right to lodge a complaint with the supervisory authority if the data subject considers that the processing of personal data concerning them is in breach of applicable data protection legislation.</p> <p><b>In Finland, the national supervisory authority is the Office of the Data Protection Ombudsman, contact details:</b></p> <p>Office of the Data Protection Ombudsman  Visiting address: Lintulahdenkuja 4, FI-00530 Helsinki  Postal address: P.O. Box 800, FI-00531 Helsinki</p> <p>Telephone (switchboard): +358 29 56 66700  Registrar's office: +358 29 566 6768  Email: tietosuoja@om.fi</p>

<b>13 Principles of the protection of the register</b>	<p>General description of technical and organisational security measures aimed at protecting the personal data of data subjects and registers at 3AMK universities of applied sciences:</p> <ul style="list-style-type: none"> <li>• An agreement has been made on the protection of the register between 3AMK and its system suppliers. Where necessary, the responsibilities are described in appropriate agreements with sufficient accuracy.</li> <li>• 3AMK employees and other persons are committed to observing non-disclosure obligations and keeping confidential the information they receive in connection with the processing of personal data.</li> <li>• System suppliers (processors acting on behalf of the controller) manage the register and the retention of related data in accordance with good data processing practice and comply with absolute non-disclosure obligations and confidentiality.</li> <li>• The data security and confidentiality of personal data in the 3AMK personal data register is ensured by appropriate technical and administrative measures in accordance with good data processing practices.</li> <li>• 3AMK has restricted access rights and authorisations to information systems, tools and other storage platforms so that the data can only be viewed and processed by persons necessary for the processing of the data due to their duties or other work tasks.</li> <li>• Only employees who have the right to process personal data for their work and/or other tasks are entitled to use the system containing personal data. Employees receive appropriate training for these tasks.</li> <li>• Each user of a tool/system is identified in the system with their personal IDs that are assigned when the user is granted access. The access rights expire when a person moves away from the duties for which the access was granted in their university of applied sciences.</li> <li>• The data is collected in databases that are logically and physically protected.</li> <li>• The databases and their backups are located in locked spaces, and the data can only be accessed by certain designated persons.</li> </ul>
<b>14 Automated decision-making and profiling</b>	<p>The Personal data register for 3AMK teaching and learning excellence and the information therein are principally not used for automated decision-making or profiling.</p>