

# Privacy Notice Student Union of the University of Jyväskylä

Updated May 25, 2018

The personal data processed by the Student Union is divided into the following categories:

- Student's data from the student register
- Data collected in connection to organizing the Student Union administration: The council of representatives, other elective offices, student representatives and employees
- Housing and rental services
- Other Student Union activities and services

Student Union activities are governed by the Act on the Openness of Government Activities (621/1999) and the documents produced or received by it are public, unless it is covered by a specific requirement of confidentiality. Granting access to the document is governed by the said law.

## Student data from the student register

### The purpose of processing data

The Student Union of the University of Jyväskylä is a public law organization, governed by the Universities Act. Its members include all undergraduate students at the University of Jyväskylä. The Student Union may also accept other university students as members, for instance postgraduates and exchange students. The university maintains a student register, which simultaneously acts as the Student Union's member register, following the principles stated above. To verify its members, the Student Union uses the student register via a technical connection agreed together with the university. The data is used for processes related to Student Union membership, such as membership verification and communications. The purpose is to fulfil the legal obligations and the efficiency of the services.

### Basis for processing data

The processing of data is based on the EU Data Protection Regulation (2016/679) or the applicable national law and the agreement between the Student Union and the University of Jyväskylä on the disclosure and processing of data.

- membership fee payment: § 46 of the Universities Act (558/2009)
- verification of the eligibility for the Council of representatives elections, and for those elected, during the parliamentary term: Statutory obligation: EU regulation 2016/679, Art. 1. c), Section 46.6 of Universities Act (558/2009), Section 4 of Government Decree on Universities (770/2009)
- consent: EU Regulation 2016/679, Art. 1. (a)

- entering the members in the electoral register of the Council of Representatives elections (the right to vote): statutory obligation: EU Regulation 2016/679, Art. 1. c), Universities Act (558/2009) Section 46.6, Government Decree on Universities (770/2009) Section 4
- verification of the eligibility to represent students in the university administration both during the elections and the administrative term: the exercise of official authority: EU Regulation 2016/679, Art.1. (e) Statutory obligation: Art. 1. c), Section 46.2 of the Universities Act (558/2009)
- to ensure the efficiency of the services and to send the following items by mail when necessary: student card, Jyväskylä's student newspaper, honors, badges, certificate of employment or position of trust: Consent: EU Regulation 2016/679, Art. 1. (a) Statutory obligation: Employment Contracts Act (55/2001) 6 Chapter 7, legitimate interest.

## **Contact person**

Student Union's Executive Director Minna Oinas (toiminnanjohtaja@jyy.fi)

## **Personal data groups**

The Student Union processes the following information through the student register: name, address, date of birth, student number, telephone number, student union membership, right to complete a degree, home country

- Origins of the data: The student register maintained by the university, information provided by the students themselves
- Retention Period: The Student Union does not store the data, it only processes the data.
- Student Union employees processing the data

## **Right of access, right of rectification, right of erasure, right of limitation, right of objection**

All requests for data correction or erasure must be addressed to the Student Services of the University of Jyväskylä. A member of the Student Union has no right to demand restrictions on the disclosure of data.

## **Right of appeal to the supervisory authority**

JYU Data Protection Officer:

Riikka Valkonen, [riikka.h.valkonen@jyu.fi](mailto:riikka.h.valkonen@jyu.fi)

## **Principles of protecting personal data**

The Student Union does not primarily store information, but only processes it. Processing takes place via a secure connection to the university's student register. When necessary, data may be stored to fulfil statutory obligations. The data is processed, stored and transmitted only via university's own technical data transfer equipment.

## **Data collected in connection to organizing the Student Union administration**

### **1. Council of representatives**

#### **Purpose of processing data**

The Council of Representatives exercises the highest decision-making power in the Student Union. The data of the candidates is processed to organize elections open for all Student Union members. The Council of Representatives and its deputies are formed based on the election results. The data regarding the elected representatives is used to organize the activities of the Council.

#### **Basis for processing data**

Article 6 (1) (e) of the Data Protection Regulation. §4.1 (1) of the Privacy Act. §46.6 of the Universities Act and §4 of the Universities Decree. Regarding the potential political opinion of the candidate or representative, Article 9 (2) (e) of the Data Protection Regulation.

#### **Contact person**

Student Union's Executive Director Minna Oinas (toiminnanjohtaja@jyy.fi)

#### **Categories of personal data**

The member list of the Council of Representatives contains information on election results of each candidate and each election coalition. The list also contains information about the temporary resignations declared by the representatives themselves.

#### **Groups of recipients of personal data**

Names and election coalitions of the candidates for the Council of Representatives are published online at jyy.fi. Those organizing the elections have access to the contact information. The Council of Representatives member list is published at jyy.fi and council meetings are streamed online for everyone to see. The Council of Representatives acts in accordance with the Publicity Act.

#### **Data transferring to the third countries**

If data will be transferred to third countries, this must be indicated when the data is collected. The data can be processed using a system or a cloud service that stores the data outside the EU. If data is transferred outside the European Union or the European Economic Area, such transfer shall be

subject to the guarantee of an adequate level of data protection in that country, or the register holder shall provide sufficient safeguards through contractual clauses or in other means, to protect the privacy and rights of individuals, or the registered shall give an explicit consent for the transfer. The transfer of data to the United States is based on a Commission decision on an adequate level of data protection under Article 45 of the Data Protection Regulation and Privacy Shield.

The data is retained for the duration of the Council of Representatives term. List of all candidates and the documents of the Central Election Committee and Council of representatives' meetings are permanently archived. For the sake of transparency in decision-making, recordings of the Council meetings are retained until further notice.

## **2. Other Student Union trustees**

### **Purpose of processing data:**

The autonomy of the Student Union includes the right to decide on the organization of internal administration as it deems best. When organizing the administration, personal data is collected.

### **Basis for processing data**

Article 6 (1) (e) of the Data Protection Regulation. Section 4.1 (1) of the Data Protection Act. §46.6 of the Universities Act. Article 9 (2) (e) of the Data Protection Regulation as regards to a political opinion of a candidate or representative of the Council.

### **Contact person**

Student Union's Executive Director Minna Oinas (toiminnanjohtaja@jyy.fi)

### **Description of the groups of registered and categories of personal data**

Name, council group (if any), student number, faculty, address, phone number, email address, diets. Some trustee positions are remunerated. In these cases, the data necessary to pay the fee is collected from the individuals: account number, social security number, tax card.

### **Groups of the recipients of personal data:**

The names of the trustees are available at jyy.fi. Other data is available to those involved in the Student Union administration.

### **Data transferring to the third countries**

If data will be transferred to third countries, this must be indicated when the data is collected. The data can be processed using a system or a cloud service that stores the data outside the EU. If data is transferred outside the European Union or the European Economic Area, such transfer shall be subject to the guarantee of an adequate level of data protection in that country, or the register

holder shall provide sufficient safeguards through contractual clauses or in other means, to protect the privacy and rights of individuals, or the registered shall give an explicit consent for the transfer. The transfer of data to the United States is based on a Commission decision on an adequate level of data protection under Article 45 of the Data Protection Regulation and Privacy Shield.

The data is retained for the duration of the Council of Representatives term. List of all candidates and the documents of the Central Election Committee and Council of representatives' meetings are permanently archived. For the sake of transparency in decision-making, recordings of the Council meetings are retained until further notice.

### **3. Administration's student representatives**

#### **Purpose of processing data:**

The statutory duties of the Student Union include the appointment of student representatives to the university bodies, referred to in Chapter 3 of the University Act. When electing student representatives, personal data is collected. Act on Equality between Women and Men applies to institutions exercising public authority.

#### **Basis for processing data**

Article 6 (1) (e) of the Data Protection Regulation. §4.1 (1) of the Data Protection Act. §46.2 of the Universities Act.

#### **Contact person**

Student Union's Executive Director Minna Oinas (toiminnanjohtaja@jyy.fi)

#### **Description of the groups of registered and categories of personal data**

Name, student number, degree rights, address, phone number, email address.

#### **Groups of the recipients of personal data:**

The names of the trustees are available at jyy.fi. Other data is available to those involved in the Student Union administration.

#### **Data transferring to the third countries**

If data will be transferred to third countries, this must be indicated when the data is collected. The data can be processed using a system or a cloud service that stores the data outside the EU. If data is transferred outside the European Union or the European Economic Area, such transfer shall be subject to the guarantee of an adequate level of data protection in that country, or the register holder shall provide sufficient safeguards through contractual clauses or in other means, to protect the privacy and rights of individuals, or the registered shall give an explicit consent for the transfer. The transfer of data to the United States is based on a Commission decision on an

adequate level of data protection under Article 45 of the Data Protection Regulation and Privacy Shield.

The data is retained for the duration of the Council of Representatives term. List of all candidates and the documents of the Central Election Committee and Council of representatives' meetings are permanently archived. For the sake of transparency in decision-making, recordings of the Council meetings are retained until further notice.

## **4. Employees**

### **Purpose of processing data:**

In order to fulfil legal obligations as an employer, Student Union collects and retains data about the employees.

### **Basis for processing data**

Legal obligations related to employment. Article 6 (1) (b) and (c) of the Data Protection Regulation. For specific categories of personal data, Article 9 (2) (b). Regular sources: registered person, manager of the registered person, documents relating to job search, personnel decisions and occupational health.

### **Contact persons**

Student Union's Executive Director Minna Oinas (toiminnanjohtaja@jyy.fi), Student Union's Managing Director Marko Huttunen (marko.huttunen@jyy.fi) and accountant Kirsi Jussila (kirsi.jussila@jyy.fi)

### **Description of the groups of registered and categories of personal data**

Name, social security number, address, phone number, email address, trade union membership, sick leaves, bank account details, tax card, employment contract, education, other employee information.

### **Groups of the recipients of personal data:**

For the sake of transparency in the administration, the names, photos and other work-related data of the employees is available at jyy.fi. Other data is available for the representatives of the employer and for accounting, if necessary.

### **Data transferring to the third countries**

If data will be transferred to third countries, this must be indicated when the data is collected. The data can be processed using a system or a cloud service that stores the data outside the EU. If data is transferred outside the European Union or the European Economic Area, such transfer shall be subject to the guarantee of an adequate level of data protection in that country, or the register

holder shall provide sufficient safeguards through contractual clauses or in other means, to protect the privacy and rights of individuals, or the registered shall give an explicit consent for the transfer. The transfer of data to the United States is based on a Commission decision on an adequate level of data protection under Article 45 of the Data Protection Regulation and Privacy Shield.

### **Schedule for retaining data**

The data is retained for a time period specified by law, after which the data not included in the archive material is destroyed. There will be a record of those who have been employed by the Student Union in the Student Union's archive material and on jyy.fi website.

### **Right of access, right of rectification, right of erasure, right of limitation, right of objection**

All requests for rectification or erasure of data related to organizing the administration of the Student Union shall be addressed to the Executive Director of the Student Union of the University of Jyväskylä, Keskussairaalantie 2, 40600 Jyväskylä. The request must be in written form and signed by hand.

## **Housing and rental services**

### **Data collection:**

Data is collected from the registered person, for instance via the rental application form and other electronic services maintained by the controller. Personal data may also be collected and updated from controller's other personal data registers, from resigning customers, from the controller's partners, and from authorities and companies providing personal data services, such as the Population Register Centre and credit register of Suomen Asiakastieto Oy.

### **Purpose of processing data:**

Due to their housing and rental activities, Student Union of the University of Jyväskylä is processing personal data.

### **Basis for processing data**

Personal data is processed for the purposes of managing, analyzing and developing the customer relationship and any other business-related relationships (such as managing customer information and rental ledger, termination of rental contracts, customer inquiries, housing maintenance, sharing necessary data with maintenance companies and specialized dealers, sharing data such as amount of rental debt with debt collection agencies, customer communications; and planning and developing business).

### **Contact person**

Student Union's Managing Director Marko Huttunen (marko.huttunen@jyy.fi)

## **Description of the groups of registered and categories of personal data**

### **Tenant selection and management**

The following personal data about the applicants, tenants and possible co-tenants may be processed in the register. This includes basic information (such as name, social security number, postal addresses, telephone numbers, email addresses and gender), as well as customer relationship and other business-related information (such as customer start date, customer number, study-related information regarding student housing, personal data of possible co-tenants, information of possible trustee/guardian, income and wealth information, credit details, debt settlement information, information about housing needs, rent details such as rent contract, rent payment information, information on insurance and termination of the rental contract, names and social security numbers of the persons living in the same apartment, data related to tenant services such as parking information, key release and return dates, reclamations, feedback and other customer communications, procedures including recordings of phone calls, marketing measures and their use, as well as the data and bank account information relating to the termination of the rental contract).

### **JYY tenant network and tenant network support service**

Tenants living in apartments owned by the Student Union have access to the network connection which is technically provided by the University of Jyväskylä. The hardware addresses that technically identify the network devices are collected to enable the Student Union tenant network's name server to provide each device with its own unique session ID. The tenants using the network connection disclose this data via a separate form. The network is technically implemented as part of a publicly funded university network and thus users must be identified. A combination of a resident's name and an apartment information will ensure that the device connected to the network is linked to the correct apartment and resident. In the event of abuse of a publicly funded network, the responsible user may be disconnected from the network in accordance with the terms of use.

To provide the best possible internet experience for residents, JYY offers a support service for the users of the network. The service can be accessed by filling out an online form. The form retains the users' name, email and home address, as well as the model information of the device connected to the network and the main device.

The data disclosed by the tenant while registering for the service is disclosed to the body in charge of maintaining the network for the purposes of processing registrations and support requests.

### **Video surveillance**

To detect and prevent crimes, vandalism and other misconduct on JYY-owned properties, video footage of the people, vehicles, etc. in the scene is recorded. In the event of a suspected crime, the data may be disclosed to the police.

## **Groups of recipients of the data:**

JYY employees may process housing services data to ensure good service.

## **Disclosing data and transferring to the third countries**

As a rule, information is not disclosed outside of JYY. To the extent that it is allowed by law, data may however be disclosed to partners and entities who for instance are collecting debt on behalf of JYY, and to those who are legally entitled to receive the information. In addition, information may be disclosed to housing, maintenance, security and lock services and to electricity and data network providers. Data is transferred to the electronic property maintenance, reservation and ERP systems used by the Student Union. If the owner of the apartment changes, JYY may disclose the necessary data to the new owner.

## **Data transferring to the third countries**

If data will be transferred to third countries, this must be indicated when the data is collected. The data can be processed using a system or a cloud service that stores the data outside the EU. If data is transferred outside the European Union or the European Economic Area, such transfer shall be subject to the guarantee of an adequate level of data protection in that country, or the register holder shall provide sufficient safeguards through contractual clauses or in other means, to protect the privacy and rights of individuals, or the registered shall give an explicit consent for the transfer. The transfer of data to the United States is based on a Commission decision on an adequate level of data protection under Article 45 of the Data Protection Regulation and Privacy Shield.

## **Schedule for retaining data**

The data is retained for a time period specified by law, after which the data not included in the archive material is destroyed.

## **Right of access, right of rectification, right of erasure, right of limitation, right of objection**

According to the Data Protection Act, individuals have the right to check what data about him or her is retained in the register. Requests for verification cannot be made by telephone but must be in writing and signed by hand. A written request is to be sent to JYY Accommodation and Financial Services, Vehkakuja 2 B, 40700 Jyväskylä. When requesting information, you must indicate your name, address and social security number and whether you wish to see data relating to a particular matter, all data or data from a specific period. The customer has the right to request the rectification, deletion or addition of data concerning himself/herself if the information is inaccurate, outdated, incomplete or unnecessary for the purpose of processing. The request shall be done by writing and be submitted to JYY Accommodation and Financial Services (address above).

# **Student Union's other activities and services**

## **Purpose of processing data**

The Student Union organizes events and trainings, as well as other informal activities, rents venues and goods, provides counselling, provides restaurant services, keeps contact with student associations and organizations and own alumni, concludes agreements, conducts surveys, maintains mailing lists, and rewards accomplished students and staff. The data collected via these activities is used to carry out the practical arrangements and to provide the services in the most appropriate manner.

## **Basis for processing**

Consent: EU Regulation 2016/679, Art. 1. (a)

Contract: EU Regulation 2016/679, Art. 1. b)

Student Union's legitimate interest: EU Regulation 2016/679, Art. 1. f)

## **Categories of personal data**

Data, necessary for performing some informal activities, may be collected by the Student Union.

- The origin of the information: From the individuals themselves
- Retention period: Until the end of the event or activity, or for example until the confirmation of a payment by a participant or customer.
- Potential recipients: Event organizers, financial and administrative staff
- Possible transfers to third countries: For reasons of expediency, data may be retained or transferred to third countries by technical means.
- Publicity or confidentiality: data collected by the Student Union is public unless it is covered by a specific requirement of confidentiality.

## **Basis for processing and categories of personal data**

### **Organizational data: data of representatives of organizations**

Basis: 6 Art. 1k d) and e)

Data: Names, email addresses and phone numbers of the organization's board members. The organization's email and street/postal address, which may be the same as that of the chairman or other member of the board, will also be collected. In addition, information on the major subjects represented by the subject organization and other voluntary information is collected and added on the JYY website. The sender's IP address is retained at the same time.

### **Event data: Participant data (data from free-of-charge trainings and events. Information regarding chargeable events below)**

Basis: 6 art 1k a), regarding allergy information 9 art 2k a)

Data: name, possibly an organization, diets and allergies, email address, phone number, accessibility information, and field of education.

### **Data on partners: both processing activities and own rental activities, own partners**

Basis: Art. 6k (b), Art. 2k (a) regarding allergy information

Data: Contact name, email and phone number. Regarding events also diets, organization and allergies, in some cases social security number.

### **Other business data**

Basis: Art. 6k (b), Art. 2k (a) regarding allergy information

Data: data that is necessary for restaurant sales and venue rentals: name, email address, billing address, allergy information and business ID, if necessary.

### **Controlling electronic keys**

Keys handed over to Student Union employees and partners are registered. Keyholder's name is registered, together with information of the premises where the key has access to.

### **Honors and awards**

Basis: 6 art 1k e)

Related to the 'Good Teacher' award, data from both the proposed teacher and the proposer is collected for the sake of communications. Name and email address of the proposed teacher and the proposer's argumentations. The data of the teachers awarded in the previous years has been entered to a register that expands every year.

### **Survival kit activities**

Basis: 6 art 1k a)

Data: data, phone number, email, estimated date of returning home and date of purchase.

### **Alumni register**

Basis: 6 art 1k a)

Data: data, phone number, address, previous positions in the Student Union.

### **Email lists**

Basis: 6 art 1k a)

Data: email and name (name is optional and this is mentioned in the form). Creating a password and choosing a language is required.

### **Data provided via surveys**

Basis: 6 art 1k a)

Data: name (optional), phone number and email address.

### **Register for individuals of other student unions applying for a JYY academic sticker**

Basis: 6 art 1k a)

Data: data obtained through the form; name, student number, student union membership, student union.

## **Right of access, right of rectification, right of erasure, right of limitation, right of objection**

Individuals participating in other activities of the Student Union have the right to access the data collected about them and to correct possible errors. As long as the activity is ongoing, an individual cannot request data to be deleted or restricted without waiving their right to the service or product in question. In this case as well, any commitments made by that individual up to that date shall remain in force. Requests for verification cannot be made by phone but must be submitted in writing and be signed by hand. A written request for a verification is to be sent to JYY Central Office, Keskussairaalantie 2, 40600 Jyväskylä. When requesting information, you shall indicate your name, address and social security number and whether you wish to verify information relating to a particular matter, all information or information from a specific period.

### **Data transferring to the third countries**

If data will be transferred to third countries, this must be indicated when the data is collected. The data can be processed using a system or a cloud service that stores the data outside the EU. If data is transferred outside the European Union or the European Economic Area, such transfer shall be subject to the guarantee of an adequate level of data protection in that country, or the register holder shall provide sufficient safeguards through contractual clauses or in other means, to protect the privacy and rights of individuals, or the registered shall give an explicit consent for the transfer. The transfer of data to the United States is based on a Commission decision on an adequate level of data protection under Article 45 of the Data Protection Regulation and Privacy Shield.

## **Schedule for retaining data**

In each case, data is retained for the time necessary to perform the service or activity, after which data not included in the archive material will be destroyed. Documentation generated by the Student Union's administration is permanently archived.

## **Right of appeal to the supervisory authority**

JYU Data Protection Officer:

Riikka Valkonen, [riikka.h.valkonen@jyu.fi](mailto:riikka.h.valkonen@jyu.fi)

## **Contact person**

Student Union's Executive Director Minna Oinas ([toiminnanjohtaja@jyy.fi](mailto:toiminnanjohtaja@jyy.fi))

## **Principles of protecting personal data**

Personal data may be collected by any means with the consent of the individual. However, the collected data is processed, transferred and retained only with methods equivalent or more secure to the original collection method.