

Privacy notice for Aalto Online Learning's events, communications and marketing

Privacy notice for data subjects

Personal data Aalto Online Learning's events, communications and marketing

Date 08.11.2018

The Controller Aalto University
Mailing address: PL 11000, 00076 Aalto
Visiting address: Otakaari 24, 02150 Espoo
Phone: (09) 47001

Person responsible for the register and contact information Aalto Online Learning
Tomi Kauppinen
Mailing address: PL 15400, 00076 Aalto
Visiting address: Konemiehentie 2, room B136, 02150 Espoo
Email: tomi.kauppinen@aalto.fi

Each event and newsletter have a designated person in charge and a contact person. Contact information is provided in conjunction with an event announcement, invitation or newsletter.

The data protection officer and contact information The data protection officer of Aalto University is Jari Söderström.
Mailing address: PL 11000, 00076 Aalto
Visiting address: Otakaari 24, 02150 Espoo
Phone: (09) 47001
Email: tietosuojavastaava@aalto.fi

The purpose of the register and the legal basis for processing Why and on what basis is your personal data processed?

- Personal data is processed to support communications and newsletter distribution by Aalto Online Learning, to support organizing events by the project, and to support event communications.
- Aalto Online Learning processes your personal data in its events, marketing and communications, including newsletters and social media communications. The purpose processing personal data is to enable interaction with the Aalto Online Learning community and the surrounding society. In addition, your personal data may be processed to ensure the data protection and for the prevention and investigation of data misuse.
- Lawful basis for processing of your personal data is a legitimate interest created via event registration or subscribing to a newsletter or other means of communication, or a legitimate interest to enable interaction with the surrounding society. Processing of your personal data is based on consent in such cases where personal data is used for targeted digital marketing.

The information is used for:

- The administration of participation information on events, invitations, meeting and other occasions.
- The practical realization of a particular event,
- Communications regarding future events,
- The sending of publications and newsletters,
- Marketing in accordance with article 200 paragraph 2 of the Act on electronic services (917/ 2014), and
- Management of personal data required for security reasons.

The legal basis for the processing of the personal data is the processor's legitimate interest in relation to the data subject, formed on the basis of an event registration or joining a mailing list for a newsletter or other communications. The legal basis for handling personal data required for security arrangements is the legitimate interest of the controller based on the employment relationship and, for subcontractors, the implementation of the service contract.

What personal data is being collected?

The personal data being processed can be categorized in the following manner:

- Information received upon registration, such as contact information.
- Information collected upon contact.
- Personal data included in photographs or videos, such as those taken at the event that portray an identifiable individual.
- Personal data included in marketing and communications material.

Description of the categories of personal data processed

In conjunction with most events the following personal data is gathered:

- Name
- Required contact information
- Organization
- Title
- Name and contact information of the registrar, if different from the participant

Depending on the event we may also gather:

- Participant's role at the event
- In the case of international events, the participant's home country for statistical purposes
- Information related to the participation fee and its payment
- Dietary information, if the event includes food service
- Information related to the organization of supplementary programs and services
- Information related to publication
- Participation to parts of the event program

- Information created by recording the event
- Your subjects of interest regarding training
- Your feedback on training (gathered anonymously)

In addition, information regarding a single participant's participation history may be gathered.

For the purposes of communications and marketing, the following information on the media and other stakeholders can be collected:

- Name
- Required contact information
- Organization

Sharing of personal data

A) Service providers and the sharing of photographs and video on social media

Aalto Online Learning uses service providers for the purposes of managing the website and providing the services as stated in this privacy notice.

We transfer your personal data to these parties only to the extent necessary for the purposes of providing these services as described in this privacy notice.

In addition, Aalto Online Learning may share photographs and video on social media platforms. The processing of personal data contained in these will be conducted in accordance with these platforms' privacy policies.

B) Research and academic use

In some instance we may share personal data for the purposes of research and education, in which case the personal data will be processed in accordance with the General Data Protection Regulation and national data protection legislation.

C) Statutory reasons

We may transfer your information to third parties if the processing of your personal data is required for i) fulfill statutory responsibilities or a court order; ii) detecting, preventing or handling misuses, security risks or technical issues.

Transferring your data to third countries

Transfers of personal data are conducted according to the GDPR utilizing for instance standard contractual clauses or other appropriate safeguards. This is when the transferring your data to countries outside of the European Union and the European Economic Area, particularly where those countries do not provide data protection regulation according to the standards set by the GDPR.

How long is your personal data retained?

Your personal data is retained as long as is necessary for the purpose it is being processed to fulfill, or as long as the law and other legislation requires.

- Personal data contained in photographs
- Marketing and communications data are retained until the data subject request its removal

Participant lists and other information related to a single event will be retained for a maximum of one (1) year after the conclusion of the event. Aalto University partners are required to destroy any information transferred to them after the conclusion of the event.

Information on a newsletter's or other communication's recipient list is retained until the recipient discontinues their order of said distribution or their address is no longer valid and they do not provide a new address.

Your rights in relation to your personal data

You have rights to personal data related to you that Aalto is the controller.

If you wish to use these rights, your request to do so will be judged on an individual basis. Please note that we may retain and process your personal data if it is required to fulfill our legal obligations, to solve disputes or to fulfill contractual obligations.

A) The right to access data

You have the right to access personal data related to you that is being processed by Aalto Online Learning.

B) The right to rectification

You have the right to rectify erroneous or incomplete data.

C) The right to erasure

You have the right to request the removal of your personal data in the following situations:

- You have right to request a removal of your photograph from the Aalto Online Learning website.

- You resist the processing your personal data and there is no valid legal basis for processing
- The processing of your personal data is unlawful

Aalto Online Learning will, in many cases, be required to retain your personal data to comply with legal and other obligations.

The right to restrict processing

If you dispute the correctness of the data we have collected or the the legality of our processing, or if you have restricted the processing of the data in accordance with your rights, you may ask us to restrict the processing of your personal data to storage only. In these cases, the processing of your personal data will be restricted to storage until the correctness of the data can be verified, for example.

If you do not have the right to request the removal of your personal data from our registers, you may instead request the restriction of data processing to storage only.

The right to object to data processing when processing is based on legitimate interests

You always have the right to object to the use of your data in, for example, direct marketing.

How to exercise your rights

The controller is Aalto University. Responsible person for Communications and Events is the Communications Director.

The data subject must contact the data protection officer of Aalto University if they have questions or demands relating to the processing of personal data:

DPO: Jari Söderström
Phone: (09) 47001
Email: tietosuojavastaava@aalto.fi

If you believe your data has been processed in breach of applicable data protection legislation, you have the right to lodge a complaint with the supervisory authority, the Data Protection Ombudsman (read more: www.tietosuoja.fi).