

## **PRIVACY NOTICE**

according to the EU General Data Protection Regulation GDPR, Art. 13 and 14

### **This notice concerns:**

The collection and use of personal data, including photos and videos, for promotional and informative purposes involving the programme participants and alumni of the Vaasa International Talents programme.

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### **Personal data controller**

Novia University of Applied Sciences  
Wolffintie 31  
65200 Vaasa  
Finland  
[www.novia.fi](http://www.novia.fi)

Novia University of Applied Sciences is controller for the personal data collected and processed in the Novia UAS activities – in teaching, guidance, research and development, administration, and cooperation, internally and externally.

### **Responsible unit for the processing that is described in this notice:**

International Office

### **Contact person:**

Pia Jünger, Talent Boost Coordinator  
[pia.junger@novia.fi](mailto:pia.junger@novia.fi)  
050-4782005

### **Data Protection Officer at Novia University of Applied Sciences:**

[dataskyddsbud@novia.fi](mailto:dataskyddsbud@novia.fi), +358 6 328 5000 (switchboard)

### **For what purpose do we process your personal data?**

The Vaasa International Talents programme is a joint effort between five higher education institutions in Vaasa – University of Vaasa, VAMK University of Applied Sciences, Novia University of Applied Sciences, Åbo Akademi University, and Hanken School of Economics – and part of the activities of the Vaasa Consortium of Higher Education.

The aim of the programme is to provide international degree students participating in the programme with knowledge and tools which will help them to find connections to working life and, as a result, enable them to establish themselves in Finland after graduation. Part of this programme relates to the collection and use of personal data, including photos and videos, for promotional and informative purposes involving the programme participants and alumni of the Vaasa International Talents programme. Those who consent for the programme to process personal data such as photos and videos related to the activities of the Vaasa International Talents programme and its alumni network agree to being displayed on social media platforms such as Facebook, Instagram, or LinkedIn, on the programme's webpage and other channels for promotional and informative purposes.

Personal data can also be processed for journalistic purposes. When the purpose is journalistic, Novia does not have an obligation to inform the data subjects about the processing of personal data through a privacy notice (Finnish Data Protection Act 27 §).

Storing photographs, videos and other recordings considered to be of general interest for the memory and history of the programme will be saved indefinitely.

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### **According to GDPR there must be a legal basis for processing personal data. The legal basis for processing your personal data is:**

Consent (Art. 6.1 a)

You are consulted and answer yes (by written or oral statement) to that your personal data is processed for a specific purpose. You give your consent freely after getting information about how your personal data is processed (i.e., collected, stored, shared, archived, etc.). When consent is the only legal basis for processing your personal data, you have the right to withdraw at any time. You give your consent through checking a box in the survey in Microsoft O365 Forms. You can notify that you have regretted your consent by sending an e-mail to [registrator@novia.fi](mailto:registrator@novia.fi). The processing completed before you withdrew consent is not affected.

**Justification:** No other legal basis is applicable to the purposes. Agreeing to appear in photos and videos for promotional and informative purposes is completely voluntary. Therefore, Consent is chosen as legal basis.

Public interest

**Justification:** Regarding the storage of certain photographs, public interest is used as the legal basis, for the memory and history of society and the organization.

### **Which personal data do we process, and who processes the data?**

The personal data that will be processed includes, but is not limited to, names, photos, video recordings, and other identifiable information during your participation in our programme and our events.

Only those responsible for coordinating the Vaasa International Talents programme within Novia have access to the personal data, including photos, videos and other recordings.

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### **Where do we collect your personal data from and how do we process the data?**

The photos, videos and other recordings are processed and stored in O365. You can withdraw your consent at any time and request that your data is deleted. However, personal data, including photos and videos, that have already been published before you withdrew your consent, cannot be deleted.

Storing personal data, photographs, videos and other recordings considered to be of general interest for the memory and history of the programme will be saved indefinitely.

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### **Is your personal data transferred (outside Novia University of Applied Sciences) for processing?**

Yes, personal data will be transferred for processing outside Novia University of Applied Sciences when using O365. Personal data is also transferred for processing when videos and images are published on social media platforms and possibly other online channels.

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**Is your personal data transferred to a third party (outside Novia University of Applied Sciences) for that party's purposes?**

Since Novia UAS will publish photos, videos and other materials on social media, we will pass your personal data to third parties, including transfer outside EU/EEA. We will not pass on your personal data for other purposes.

Novia might share personal data, including photos and videos, to the higher education institutions under the Vaasa Consortium of Higher Education (University of Vaasa, VAMK University of Applied Sciences, Novia University of Applied Sciences, Åbo Akademi University, and Hanken School of Economics). Only those persons responsible for coordinating the Vaasa International Talents programme at the higher education institutions will have access to it.

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**Is your personal data transferred outside EU/EEA?**

Yes, personal data will be transferred outside EU/EEA due to the tools and platforms being used.

Publishing on the social media platforms means that personal data (images, videos, etc.) is transferred outside EU/EEA, to the US. Also, as with all information stored in O365, the data might be stored in the US.

The basis of the transfer is an adequacy decision (GDPR art. 45): [https://eur-lex.europa.eu/eli/dec\\_impl/2023/1795/oj](https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj). Microsoft Corporation, LinkedIn Corporation and Meta Platforms Inc. (including Facebook and Instagram) are certified under the EU-US Data Privacy Framework."

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**Which rights do you have when Novia University of Applied Sciences processes your personal data?**

Novia University of Applied Sciences is responsible for taking appropriate technical and organisational measures to protect personal data against unauthorized or illegal processing and against damage to or loss of personal data. Personal data must always be processed in a fair and transparent manner in accordance with applicable data protection regulations.

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**According to the EU General Data Protection Regulation GDPR (Art. 12-22), you have the right to**

- get transparent information on how your personal data is processed and how you can exercise your rights (Art. 12)
- get access to your personal data at Novia University of Applied Sciences and information on the processing of data (Art. 15)
- have your personal data corrected (Art. 16). Note that employees and students at Novia University of Applied Sciences can in most cases correct their own data according to the instructions on the intranet.
- have your data erased ("the right to be forgotten") in certain situations (Art. 17)
- restrict the processing of your personal data in certain situations (Art. 18)
- have your personal data transferred between systems in certain situations (Art. 20)
- object to the processing of your personal data in certain situations (Art. 21)
- not be subject to automated decision-making, with certain exceptions (Art. 22)

Also, you have the right to be informed of a personal data breach involving a high risk to your personal data (Art. 34).

**When the purpose of the processing is scientific research, statistics or archival purposes,** the rights may be restricted by the Data Protection Act (1050/2018). Restrictions on rights always require special safeguard measures.

**If you have questions about your rights,** you can contact the responsible contact person (see above) or the Data Protection Officer ([dataskyddombud@novia.fi](mailto:dataskyddombud@novia.fi)) at Novia University of Applied Sciences. See also the overall information on the processing of personal data on the Novia UAS website (<https://www.novia.fi/en/about-us/leading-documents/data-protection/>).

**You have the right to lodge a complaint with the data protection authority** if you believe that the processing of your personal data is an infringement of the General Data Protection Regulation (GDPR).

Contact information to the data protection authority  
Office of the Data Protection Ombudsman  
PL 800  
00531 Helsinki  
+358 29 566 6700 (switchboard)  
[tietosuoja@om.fi](mailto:tietosuoja@om.fi)  
[tietosuoja.fi](https://www.tietosuoja.fi)