

## PRIVACY NOTICE

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

### This notice concerns:

- A tool: Candour ID
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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:

Student Services

### Contact person:

Jessica Bonde, [jessica.bonde@novia.fi](mailto:jessica.bonde@novia.fi)  
Ida Bäcklund, [ida.backlund@novia.fi](mailto:ida.backlund@novia.fi)

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

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

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

We process your personal data with this tool to identify you as a student at Novia UAS if you do not have Finnish online banking codes or mobile certificate. We do not require you to use the Candour ID service to identify yourself but offer it as an alternative to booking an appointment with Student Services staff for manual identification. Everyone who studies at Novia UAS needs to be identified so that we know our students and so that we can activate the ICT user account that gives you access to the study register and other services.

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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 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:**

Your personal data is processed to identify you as a student at Novia UAS and to be able to activate your ICT user account. The Candour ID service is offered as an option that you can freely choose to use. Since it is not a question of compulsion to use this service, the requirement that consent is always to be given completely voluntarily is met. The basis for processing special categories of personal data (biometric data) is also consent (GDPR art. 9.2 a). The identification service is used by a limited number of people within the organization and MFA is used when logging in to the service. Personal data is not stored longer than necessary. The consent is deleted at the same time as the personal data is deleted.

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

- name
- email address
- telephone number
- student number
- passport photo
- passport information
- facial image

The personal data is processed by staff within Student Services who are responsible for identifying students: student affairs officers, planners, coordinating planner and developer. Candour Oy acts as personal data processor outside Novia.

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

In connection with the application for a study place or registration for studies at Novia UAS, you have provided your personal data yourself. This personal data has been registered in our study register Peppi. When you agree to identify yourself via Candour ID, the person handling your case registers the necessary personal data in the identification service to be able to send you an invitation. When you use the identification tool, you yourself give the tool access to the remaining personal data required to identify you. The personal data stored in the identification service is only used to note that you have been identified. The data is deleted from the service 14 days after successful identification. You can also ask to have the data deleted earlier by contacting us.

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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. The identification service Candour ID is provided by an external company (Candour Oy), which acts as a personal data processor. A separate agreement for the processing of personal data has been drawn up.

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

No, personal data will not be transferred outside Novia University of Applied Sciences.

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

No, personal data is not transferred outside EU/EEA.

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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.

**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)

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**APPENDIX: Additional information about a long-term or persistent register, system, or tool**

**Principles for how the data/register is protected:**

The identification service is used via the Internet and use is limited by user rights. A limited number of people among the Student Service's staff have access to the identification service through multi-factor authentication (username, password, and mobile phone). Only the persons who must identify students within the scope of their duties have access to the identification service.

**Principles and regulations for storage and storage time:**

The personal data is not stored longer than necessary in the identification service. The personal data is deleted 14 days after successful identification. Students can also request to have their data deleted earlier. Students who have received an invitation to the service can also request to have their data deleted even if the identification has not been made via Candour ID.

**List of regular data sources (national registers, etc.):**

The personal data required to send an invitation to the identification service is taken from our study register Peppi. Other personal data that is collected to be able to identify the person via Candour ID is collected from the person herself/himself in connection with the use of the service.

**Detailed information on automated decision-making:**

The Candour ID mobile application compares the person's facial image with the information stored in the person's passport. If the automatic identification fails, students can always book an appointment for manual identification.