**PRIVACY NOTICE**

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

**This notice concerns:**

Collection of personal data for: **International Week**

**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 persons:**

Isabelle Bonnet

International Coordinator, Turku & Raseborg campus

[isabelle.bonnet@novia.fi](mailto:isabelle.bonnet@novia.fi)

phone +358447623127

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Mai Stenblad

International Coordinator, Vaasa & Jakobstad campus

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Wolffskavägen 33 65200 Vasa

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

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

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

Novia UAS organizes International Weeks at its campuses located in Vaasa, Jakobstad, Turku, and Raseborg. Detailed information can be found here <https://www.novia.fi/en/visit-us/international-staff-weeks/> . It is necessary for Novia to process personal data in order to be able to:

1. receive registrations to the event,
2. organise sessions, workshops and teamwork activities,
3. create statistics of staff mobilities for the Ministry of Education and Culture,
4. process photos for promotional activities on Novia’s web pages and social media, and
5. make joint restaurant reservations.

**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. Consent is used as the legal basis for processing personal data since no other legal basis is applicable and it is completely voluntary to participate in the event.

*(1. Purpose: Receiving registrations to the event, ~~2. Purpose: Organising accommodation,~~   
3. Purpose: Organising sessions, workshops and teamwork activities, 6. Purpose: Making joint restaurant reservations)*

**Legal obligation (Art. 6.1 c)**

There are laws or regulations that require Novia University of Applied Sciences to process certain personal data in its operations. According to the Finnish Universities of Applied Sciences Act 45 §, the universities of applied sciences shall provide the Ministry of Education and Culture with the information that the ministry requires for evaluation, development, record-keeping for statistics, and other monitoring and governance of education and research, in the manner determined by the ministry.

*(4. Purpose: Creating statistics of staff mobilities for the Ministry of Education and Culture)*

**Legitimate interest (Art. 6.1 f)**

It is necessary to process personal data for a purpose that concerns the legitimate interest of Novia University of Applied Sciences or another party. Your personal data can then only be processed if a balancing test shows that the protection of your personal data does not outweigh the legitimate interest. According to the balancing test that Novia UAS has done, Novia UAS has legitimate interest to process photos for promotional activities on Novia’s web pages and social media.

*(5. Purpose: Processing photos for promotional activities on Novia’s web pages and social media)*

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

1. **Purpose: Receiving registrations to the event.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) will process the data: name, email, phone.

1. **Purpose: Organising sessions, workshops and teamwork activities.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) and selected Novia UAS teachers who will give presentations during the International Week will process the data: name, home university, department and position, city and country.

1. **Purpose: Creating statistics of staff mobilities for the Ministry of Education and Culture.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) and selected staff at Novia UAS Student Services and Novia UAS Human Resources who assist in the creation of statistics of staff mobilities will process the data: name, sex, home university, country, date of arrival and departure.

1. **Purpose: Processing photos for promotional activities on Novia’s web pages and social media.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) will process the data: photos taken during the International Week.

1. **Purpose: Making joint restaurant reservations.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) will process the data: diet preferences.

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

We collect the personal data through a Microsoft Office Form that has been created for the registration to the event, where the interested participants fill in their personal data themselves. The Form is made available only to teachers and staff members of Novia’s partner universities and the Form answers are accessible only by Novia UAS International Office.

Information from the Microsoft Office Form is stored in Microsoft Office Excel spreadsheets locally on Novia servers. The data transfer to Excel is done by Novia UAS International Office.

1. **Purpose: Receiving registrations to the event.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) will process parts of the Excel lists with data from participants. The justified reasons are: the applicants are selected to participate in the International Week, communication between Novia UAS International Office and the applicants, documentation in cases of Erasmus+, Erasmus Global or Nordplus staff exchanges.

1. **Purpose: Organising sessions, workshops and teamwork activities.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) and selected Novia UAS teachers who will give presentations during the International Week will process parts of the Excel lists with data from participants. The justified reasons are: the applicants are selected to participate in the International Week, printing of name badges for the participants in the International Week, the teachers arrange teamwork activities during the International Week workshops, participant lists will be shared among all participants, with their consent, since one of the goals is to give the participants as many opportunities as possible to get to know each other and network.

1. **Purpose: Creating statistics of staff mobilities for the Ministry of Education and Culture.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) and selected staff at Novia UAS Student Services and Novia UAS Human Resources who assist in the creation of statistics of staff mobilities will process parts of the Excel lists with data from participants. The justified reasons are: the Ministry of Education and Culture collects statistics of staff mobilities on a yearly basis.

1. **Purpose: Processing photos for promotional activities on Novia’s web pages and social media.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) will process photos taken during the International Week. The justified reasons are: we will publish photos at Novia’s website and on social media and use them for promotional activities.

1. **Purpose: Making joint restaurant reservations.**

Staff employed at Novia UAS International Office (International Coordinators, Head of International Relations, Service Coordinator) will process parts of the Excel lists with data from participants to inform restaurants about possible diet preferences.

The collected data will be deleted after a maximum period of one year. More specifically, the collected data from Microsoft Forms will be transferred to Microsoft Excel lists, so the data from Microsoft Forms will be deleted within one week after the International Week has taken place. Regarding the Microsoft Excel lists that are stored locally on Novia servers, and since the Ministry of Education and Culture requires the collection of statistics of staff mobilities every year in February, hence the purpose expires and the data from Microsoft Excel is no longer needed when the statistics are sent to the Ministry of Education and Culture, every year after February 28th.

Photos are stored locally on Novia servers for a period of 25 years.

**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.

Using Microsoft services and tools (e.g. Forms) involves personal data being temporarily transferred to Microsoft.

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

Yes, personal data may be transferred outside Novia University of Applied Sciences to a third party, for that party’s purposes.

In the cases of restaurant reservations, Novia UAS will transfer information of possible diet preferences. Only the number of people that have a diet preference will be transferred to restaurants. No names will be transferred.

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

Yes, personal data may be transferred temporarily outside EU/EEA due to the tool being used.

Novia UAS will not manually transfer applicants’ personal data outside EU/EEA for the purposes of the International Week arrangements. In practice, though, using Microsoft services and tools (e.g. Forms) may involve personal data being temporarily transferred outside the EU/EEA.

Yes, selected images can be published on social media.

In July 2023, the European Commission made a decision that the USA has an adequate level of data protection. Organizations transferring personal data from the EU to the USA can certify themselves under the EU-U.S. Data Privacy Framework in accordance with the adequacy decision. Upon certification, an adequate level of protection is considered to be provided for the personal data transferred to these organizations. Meta Platforms Inc, which owns the platforms where Novia UAS will publish images (Facebook and Instagram), is certified under the framework.

**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 ([dataskyddsombud@novia.fi](mailto:dataskyddsombud@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://tietosuoja.fi/en/home)