

Privacy NOTICE

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

This notice concerns:

Application to the Vaasa International Talents programme and activities within the scope of the programme. This 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.

Personal data controller

Novia University of Applied Sciences
Wolffintie 31
65200 Vaasa
Finland
www.novia.fi

University of Vaasa
Wolffintie 32
65200 Vaasa
Finland
www.uwasa.fi

Vaasa University of Applied Sciences VAMK
Wolffintie 30
65200 Vaasa
Finland
www.vamk.fi

Åbo Akademi University
Tuomiokirkontori 3
20500 Turku
Finland
www.abo.fi

Hanken School of Economics
Arkadiankatu 22

00100 Helsinki
Finland
www.hanken.fi

Novia University of Applied Sciences, University of Vaasa, VAMK University of Applied Sciences, Åbo Akademi University and Hanken School of Economics are controllers for the personal data collected and processed in the Vaasa International Talents Programme 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 of Novia University of Applied Sciences

Contact person:

Aina Rodríguez Angelet, Coordinator for Vaasa International Talents
aina.rodriguezangelet@novia.fi
050-4097228

Data Protection Officer at Novia University of Applied Sciences:

dataskyddsbud@novia.fi, +358 6 328 5000 (switchboard)

For what purpose do we process your personal data?

The aim of the Vaasa International Talents 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. The number of seats on the programme is limited, and students need to separately apply to it through a separate application form.

Novia University of Applied Sciences has by the Vaasa Consortium of Higher Education been assigned the coordinating role of the Vaasa International Talents programme. Novia University of Applied Sciences coordinates the application process to the programme. The admission, events and other activities within the programme are a shared responsibility between the

participating universities. Thus, we need to process your personal data to receive applications, carry out the selection of programme participants, and conduct the programme, including interaction with stakeholders and the society.

The personal data that will be processed within activities during the programme period will also include photos and possible videos collected at various events arranged. A separate privacy notice is available regarding the use of 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.

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

Public interest or official authority (Art. 6 1 e)

Novia University of Applied Sciences has statutory tasks of public interest and the right to exercise official authority according to the Universities of Applied Sciences Act. Development and innovation activities that benefit the education at Universities of Applied Sciences, promote working life and regional development, and revitalize the economic structure of the region are examples of statutory tasks of public interest (see Universities of Applied Sciences Act 4.2 §)

Justification: To fulfil the coordinating role of the Vaasa International Talents programme on behalf of the participating higher education institutions, Novia University of Applied Sciences needs to be able to gather the applicants' information needed for the selection to and management of the programme, which offers and develops competence development for Finnish working life. When doing this, we rely on the legal basis public interest or official authority.

Consent (Art. 6 1 a)

Applicants are not required to include a photo of themselves or a link to their LinkedIn profile (or other similar profiles) in their application, but if they choose to do so, consent is used as the legal basis. Applicants are consulted and give their consent by written statement in the application form created in O365 Forms to that their personal data in question is processed for the purpose of evaluating applications and selecting participants to the programme. The consent is freely given after the applicant has read the information in this privacy notice about how the personal data is processed.

If Novia UAS finds a potential internship position or sparring partner for a participant (or similar), Novia UAS will separately ask for the participant's consent for sharing their personal data (name, email address and phone number) prior to sharing the personal data with the other party via e-mail.

Applicants have the right to withdraw their consent at any time by notifying Novia UAS that they have regretted their consent by sending an e-mail to registrator@abo.fi. The processing completed before the consent has been withdrawn is not affected.

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

The personal data that will be processed regarding application and admission are names and contact details of the applicants, as well as other types of background information, such as the applicants' previous working life experience and motivation to participate in Vaasa International Talents programme. The applicants need to provide links to their CV and a video application when applying to the programme.

The persons having access to the complete applications and personal data are the persons responsible for coordinating the Vaasa International Talents programme at Novia UAS. Additionally, each participating higher education institution will have access to the applications from applicants from their own institutions for the review of applications and selection of programme participants. When the selection is made, admitted students' names will be shared with the partnering higher education institutions.

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

The applications are gathered by means of an application form created in O365 Forms and the personal data of applicants is shared via Teams with the HEI they are studying in.

The contact information gathered through the application form are consolidated into registers saved in O365 and Microsoft (Excel and Word). They are required for the detailed management of the programme including activities and communication. These communications are carried out via email (and occasionally via phone number) and inform students about relevant information regarding the programme such as the selection of a student to the programme, the dates and location of the programme lectures and events, among others.

Anonymous details of the applicants – such as higher education institutions and degree levels represented - will also be used for reporting purposes in statistical form as percentages and as tables/charts in various reports to the project stakeholders and in publications.

The Vaasa International Talents programme will keep your personal data until a year after you have finished your participation in the programme for statistical purposes.

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

Yes, personal data gathered in the application and admission process will be shared with the programme partners in the context of application evaluation and admission of students.

Personal data will be transferred for processing outside Novia University of Applied Sciences when using O365 Forms survey and O365 Excel.

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

Yes, personal data will be transferred outside Novia University of Applied Sciences to the programme partners - University of Vaasa, VAMK University of Applied Sciences, Novia University of Applied Sciences, Åbo Akademi University, and Hanken School of Economics. The Vaasa International Talents programme will not otherwise pass on any personal data to third parties without the consent of the programme participants.

If Novia UAS finds a potential internship position or sparring partner for a participant (or similar), Novia UAS will share their personal data (name, email address and phone number) via e-mail, provided that the participant has consented to this.

Is your personal data transferred outside EU/EEA?

Yes, personal data may be transferred temporarily outside EU/EEA due to the tools being used. As with all information stored in Microsoft O365, the data might be stored in the US.

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 (dataskyddsbud@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
tietosuoja.fi