

---

## PRIVACY NOTICE

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

### This notice concerns:

A register for the Alumni network for the Vaasa International Talents programme participants. The 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.

---

### Personal data controller

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

University of Vaasa  
Wolffintie 32  
65200 Vaasa  
Finland  
[www.uwasa.fi](http://www.uwasa.fi)

Vaasa University of Applied Sciences VAMK  
Wolffintie 30  
65200 Vaasa  
Finland  
[www.vamk.fi](http://www.vamk.fi)

Åbo Akademi University  
Tuomiokirkontori 3  
20500 Turku  
Finland  
[www.abo.fi](http://www.abo.fi)

Hanken School of Economics

---

Arkadiankatu 22  
00100 Helsinki  
Finland  
[www.hanken.fi](http://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.rodriquezangelet@novia.fi](mailto:aina.rodriquezangelet@novia.fi)  
050-4097228

**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 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. Part of the support provided by the programme relates to networking activities. Networking by nature is more long-term than the few months when the students are actively participating in the programme. The programme aims at building relationships and give support to the programme participants which last beyond programme participation. For this purpose, the programme maintains an Alumni network, to which all programme participants are invited after each programme round. Those who explicitly wish to be included in the Alumni network are added to the register of programme alumni. Their contact information is used for communication purposes, such as for inviting the alumni to

---

networking activities arranged or for the purpose of engaging alumni in aspects of programme development.

Novia University of Applied Sciences has by the Vaasa Consortium of Higher Education been assigned the coordinating role 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:**

**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:** No other legal basis is applicable to the purpose. Being part of the alumni network is completely voluntary. Therefore, Consent is used.

---

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

The personal data that will be processed are names, email addresses and phone numbers of the alumni.

The consolidated information forms the alumni network register. The register is used for maintaining distribution lists. The contact information can also be used for contacting individuals, such as for the purpose of guest lecturing or mentoring queries, or alumni events.

---

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

The personal data will be collected from those who have participated in the programme by

**Commented [AW1]:** I don't know how you have planned to ask for consent and document consent, but I think the best way to make a check box in the Microsoft Forms survey saying

"I have read and understood the information in the privacy notice. I consent to my personal data being processed as described in the privacy notice."

**Commented [ARA2R1]:** We are doing so!

means of an O365 Forms survey. The data is processed and consolidated into an Alumni register in O365 Excel. The Vaasa International Talents programme will keep the register indefinitely as long as Novia coordinates the programme.

You can withdraw your consent at any time and request that your data is deleted from the register.

---

**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 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 might be transferred outside Novia University of Applied Sciences.

---

**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 O365 and Microsoft, 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**

**Commented [AW3]:** I think Novia runs Microsoft Excel on premise (on Novias's own servers), which means that if you are only handling the Excel spreadsheet in the Excel app on your Novia-computer, there is no transfer to Microsoft. However, if you are handling the spreadsheet in the cloud version of Excel, the data is transferred to Microsoft.

**Commented [ARA4R3]:** We use both

**Commented [AW5]:** Again, I strongly recommend that you would try to make a contract for the cooperation and also the processing of personal data. If there is no contract, I cannot recommend that you share personal data as described.

Also note that this sentence should be moved down to the next question, since (to my understanding) the universities can process the personal data for their own purposes, not Novia's.

The personal data that will be processed according to this privacy notice are names, email addresses and phone numbers. I got the impression that you might want to share only photos with the other universities. If that is the case, you do not need to mention the transfer to other unis at all in this privacy notice (since photos are not even processed by Novia according to this privacy notice). But if you might transfer any of the personal data mentioned here, you obviously need to mention that.

**Commented [ARA6R5]:**

**Commented [ARA7R5]:** I have deleted the sharing of the alumni register paragraph with other universities

**Commented [AW8]:** Note that if you only process personal data in the Excel app (meaning it runs on Novia servers), there is no transfer to Microsoft (see what I commented above on this topic).

Also add this after the last sentence:

"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 is certified to the EU-US Data Privacy Framework."

**Commented [ARA9R8]:** We use app and web since it is generated by Microsoft forms

- 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)