



Privacy notice: Active Directory user directory

This is a privacy notice, which is based on articles 13 and 14 of the EU's General Data Protection Regulation.

Data Controller

Turku University of Applied Sciences Ltd

Joukahaisenkatu 3

20520 Turku, Finland

Telephone exchange +358 (0) 2 263 350

kirjaamo@turkuamk.fi

Person in charge and contact persons

Juha-Pekka Saarinen, Head of digital services.

Contact information of the Data Protection Officer

Please contact in all data protection related matters: tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing the personal data

We will process the data for the purpose of providing the network and its services based on an employment relationship, right to study or external partnerships.

The user directory and its data content are used to manage access and access rights to the information systems of the university of applied sciences.



Legal basis for processing personal data

Personnel

The legal basis is Article 6, paragraph 1 c: processing is necessary for compliance with a legal obligation to which the controller is subject, or Article 6, paragraph 1b: Performance of a contract with the data subject.

Students

Article 6(1)(e): processing is necessary for the performance of a task carried out in public interest or in the exercise of official authority vested in the controller, or

Article 6, paragraph 1 (c): processing is necessary for compliance with a legal obligation to which the controller is subject.

External stakeholders

Article 6(1)(b): processing is necessary for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures at the request of the data subject.

Processed categories and storage times of personal data

The categories of processed personal data are

Staff

- The person's full name
 - user ID
 - e-mail address
 - office
 - sector
 - unit
 - telephone number
 - Home directory (location path)
 - Audiences
 - kielitieto (fin/en)
 - title
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- Google Workspace service licensing information
 - Time information for approving the rules of use of the ID service
 - ID service password hash
 - learner number
 - social security number

Students

- The person's full name
- user ID
- e-mail address
- office
- sector
- unit
- Arrival group
- Home directory (location path)
- Audiences
- kielitieto (fin/en)
- Google Workspace service licensing information
- Time information for approving the rules of use of the ID service
- ID service password hash
- Attendance information
- Student number (role number)
- learner number
- municipality of residence (municipality code)
- Finnish Authenticator UID (foreign citizens only)
- social security number

External stakeholders

- The person's full name
 - user ID
 - e-mail address
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- telephone number
 - Time information for approving the rules of use of the ID service
 - ID service password hash
 - social security number

The personal data is stored in the user directory for 390 days after the end of the employment relationship or right to study. For an external stakeholder user, the retention period is 390 days from the expiration of the user ID.

Regular information sources

Staff

The main source of information is the HR system. Individual users can also be added at the request of the supervisor using an electronic application form.

Students

The source of the information is the student information system.

External stakeholders

An electronic application form signed by the person and approved by the person in charge of the UAS.

The connection to the data sources has been implemented through an identity management system. If necessary, individual additions can also be made directly to the user directory.

Receivers or receiver groups of personal data

The personal data is received by our cooperation partner

CSC – Tieteen tietotekniikan keskus Oy

HAKA and eduGAIN trust network services

- nickname
 - surname
 - user ID
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- Language Proficiency (Fin/EN) (students only)
 - e-mail address
 - Role information
 - degree programme (students only)
 - Attendance information (students only)
 - learner number
 - municipality of residence (municipality code, students only)
 - social security number

The user is asked for permission to share information for a service connected to the HAKA trust network. The consent is service-specific and the user can see a list of the information that is disclosed to each service. The user also has the option to revoke the permission they have given.

EUDAT B2DROP PREMIUM

- nickname
- surname
- user ID
- Home organization (via EPPN data)
- Group membership (B2DROP security groups)

Turun Teknologiaiinteistöt Oy

Access rights management and control

- nickname
- surname
- user ID
- e-mail address
- sector
- unit
- Validity of the username (true/false)
- the validity period of the username (students only)

Elisa Oyj

PBX service

- Email address (staff only)
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Oiva Talotekniikka Oy

Laptop Lending Machine

- nickname
- surname
- e-mail address

Personal data is transferred from the register to the following personal data processors.

- Microsoft Corporation (Microsoft 365 services)
- Google LLC (Google Workspace for Education, YouTube)

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

The data is not transferred to third countries.

Personal data disclosed to external services may be transferred outside the EU or EEA.

Principles of data protection

The processing and protection of data follows ways to ensure appropriate security of personal data (EU General Data Protection Regulation, Article 5(1)(f)).

The data may only be processed by those people whose duties include the processing of the data. Access to the data is limited by personal access rights.

Data subjects' rights

According to the General Data Protection Regulation, the data subject has the right:

- to receive information on the processing of their personal data, unless otherwise regulated by the law
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- to request for access to their personal data and rectification regarding incorrect or insufficient information
 - to erase their data (not applied, if the basis for processing is compliance with a legal obligation or performance of a task carried out in the public interest)
 - to restrict the processing of their data
 - to object to the processing of their data, if the basis for processing is general or legitimate interest
 - to request the transfer of data they have submitted themselves from one controller to another, if the basis for processing is consent or agreement
 - withdraw the consent they have given
 - notification obligation of the controller on the rectification/erasure/restricting of processing of personal data
 - not to be subject to automated decision-making (the data subject may allow automated decision-making by their consent)

Data subjects may exercise their rights by contacting the contact person mentioned in the privacy notice or the Data Protection Officer. More information on data subjects' rights is provided by the contact person and/or Data Protection Officer.

If processing the data does not require identifying the data subject without additional information or the controller cannot recognize the data subject, the right to inspection, rectification, data erasure, restriction of processing, obligation to report and transmittal is not applied.

You have the right to file a complaint with the Data Protection Ombudsman's office, if you consider that valid data protection legislation has been breached in processing your personal data. The contact details of the DPO can be found in the beginning of the privacy notice. All requests are processed on a case-by-case basis.
