Privacy notice: Funet Miitti / Zoom Communications, Inc

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

Controller

Turku University of Applied Sciences Ltd

Joukahaisenkatu 3

FIN-20520 Turku

Telephone exchange +358 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 personal data

Turku UAS uses the online meeting and video conferencing service Zoom through the Funet Miitti service intended for higher education institutions, provided by CSC (IT Center for Science). The service is produced in

cooperation with NORDUnet (cooperation organization of national research networks in the Nordic countries). The audio, video and meeting communications of the service are processed in the server infrastructure managed by NORDUnet.

Zoom is used for online meetings, distance/remote teaching and webinars and communications which take place within these. Everyone whose user right is based on an employment relationship, right to study or external partnership with Turku UAS can use Zoom.

Personal data is processed to identify participants, enable and manage the use of the service, produce recordings and maintaining the service, to investigate technical problems and ensure data security.

Legal basis for processing personal data

The legal basis for processing personal data is to perform a task carried out a task in the public interest or exercise an official authority vested in the controller.

The activities are primarily regulated by the following laws:

- Subparagraph e of section 1, article 6 of the General Data Protection Regulation (EU 2016/679)
- Act on Universities of Applied Sciences (932/2014)

Processed categories and storage times of personal data

The processed categories of personal data are the identification data used in connection with logging in:

- First name and last name
- Email address
- Information on the organization

- Information on the role within the organization (personnel/student)
- IP address and log data
- The Microsoft Entra ID identifier which individualizes the user

Storing of personal data:

- Personal data is stored in Funet Miitti for as long as it is necessary to produce the service or until the controller or user asks for its erasure. Once the service agreement ends, CSC deletes the personal data in principle within 60 days, unless a statutory obligation requires a longer storage time.
- When the user's AD identifier at Turku UAS is removed, the user's Zoom account is deactivated and automatically deleted after 120 days.
- An external user of the organization can participate in a Zoom meeting without a Turku UAS user ID with a username they have provided themselves to be shown in the meeting. In addition, in connection with the use, technical data can be processed in the service, such as IP address and service data.

  The data of external participants is stored in the service only for as long as it is necessary for the use, maintenance and data security of the service and investigation of technical problems.

Recordings:

- Zoom enables recording the meeting locally on a user's computer. The meeting participants are notified of the recording before it is started.

  The later processing of personal data from a locally saved meeting does not fall under the processing of personal data in the Zoom service as indicated in this privacy notice. The purpose, legal basis, storage time, user rights and other data protection obligations of processing the recording are determined according to the purpose of use of the recording and the party responsible for the processing.

Regular information sources

The information source is the login carried out by the user in the software supplier's online service and the content the user creates in the online service.

Receivers or receiver groups of personal data

- CSC, NORDUnet, Zoom

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

- Turku UAS does not transfer personal data outside the EU or EEA itself. The server environments of CSC and NORDUnet are located in the EU area. In connection with producing the service, Zoom can process and transfer personal data outside the EU or EEA area. The transfers of personal data to the United States can be based on the adequacy decision made by the commission based on the EU-U.S. Data Privacy Framework (EU–U.S. DPF). If necessary, other bases for transfer according to the applicable data protection legislation in addition to necessary protection measures are used, such as the Standard Contractual Clauses (SCC) approved by the European Commission.

Principles of data protection

The data is accessed only by people whose tasks require access to the data. Access to the service is limited with user IDs and user rights.

The personal data is stored until the end of the studies or the employment relationship.

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
- 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.