Privacy notice: ThingLink

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

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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 University of Applied Sciences has a license agreement on the use of the online service ThingLink, which is intended for creating and sharing interactive content, for carrying out the work and studies of the personnel and students. To work, ThingLink requires the user to log in the online service's

website. Logging in takes place by the user with Microsoft's Entra ID SSO single sign-on method.

Legal basis for processing personal data

The legal basis for processing the personal data is the data subjects' consent. The activities are primarily regulated by the following laws:

- Subparagraph a 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
- The user's role in the organization (student/staff member)
- The Microsoft Entra ID identifier which individualizes the user

Storing of personal data:

- The user forfeits the possibility to log in ThingLink managed by Turku UAS once their AD (Active Directory user directory) user ID is removed. The ThingLink account is deactivated when 4 years have passed since the user last logged in the account. After this, the deactivated account is entirely deleted and all material destroyed after 30 days from the deactivation. If

the user wants to deactivate their account earlier, they can contact Turku UAS' Service Desk.

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

In connection with using the service, ThingLink may process technical use and log data according to its own privacy notice.

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 main data storage of ThingLink is located in Ireland, but the subprocessors used by ThingLink can process personal data also outside the EU or EEA area.

In transfers of personal data outside the EU or EEA the basis for transfer according to the applicable data protection legislation is used in addition to necessary protection measures, 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.