1. The University of Helsinki is the controller of the data file, or the party responsible for processing your data.

The University of Helsinki is the controller of the data file and HR Services the unit responsible for the processing of these personal data.

Contact details:
University of Helsinki
PO Box 3
00014 University of Helsinki
Phone: 02941 911 (switchboard)

HR Specialist Tuuli Niskanen, LLM, serves as the contact person for the controller of the data file. Her contact details are:

PO Box 53 (Fabianinkatu 32)
00014 University of Helsinki
Phone: 02941 22610
Email: tuuli.siren-niskanen@helsinki.fi

2. Data protection officer of the University of Helsinki

The data protection officer of the University of Helsinki can be contacted by email at tietosuoja@helsinki.fi and by phone at 02941 911 (switchboard).

3. Why are your personal data processed, or what is the purpose of the processing?

The University of Helsinki processes your personal data to carry out activities related to human resources administration and employment affairs, as well as to fulfil its duties and obligations as an employer. The University of Helsinki utilises the data included in the data file when performing duties concerning data subjects required by legislation, collective agreements and separate decisions and regulations. Such duties include:

- Human resources planning and staff cost budgeting
- External and internal recruitment
- Internal communication
- Orientation, management of tools and facilities
- Monitoring and allocation of working hours, work plans for employees observing the annual workload scheme
- Management of employment data
- Determination of salary and assessment of personal work performance
- Payment of salaries, fees and grants
- Skills development and training
- Conduct of development discussions
- Organisation of occupational healthcare and promotion of workplace wellbeing
- Occupational safety duties (equality, work-related accidents)
- Rewarding of employees (badges of merit, etc.)
- Management of work-related travel and international assignments, travel invoicing
- Completion of tasks related to the termination of employment
- Statistics and reporting
- Storage of professorship applicants’ data for research purposes

4. Why does the University of Helsinki have the right to process your personal data, or what is the legal basis for the processing?

Personal data are processed on the basis of the following grounds (Point 1, Article 6 of the General Data Protection Regulation of the EU), depending on the circumstances:

- **Data subjects employed by the University of Helsinki**
  - ☑ Consent given by the data subject
  - ☑ Compliance with a legal obligation to which the controller is subject
  - Legislation on which the processing is based:
    - Employment Contracts Act (55/2001)
    - Occupational Safety and Health Act (738/2002)
    - Collective agreement
  - ☑ Task carried out in the public interest/exercise of official authority vested in the controller:
    - ☑ Scientific or historical research purposes or statistical purposes
    - ☑ Archiving of research materials and cultural heritage materials
    - ☑ Processing carried out by public authorities for the performance of a task carried out in the public interest
  - ☑ For the purposes of the legitimate interests pursued by the controller or by a third party
    - Specify the legitimate interest: reporting required by funders, skills assessment
  - ☑ Performance of a contract to which the data subject is party

- **Data subjects not employed by the University of Helsinki, such as grant-funded researchers, docents and fee recipients:**
  - ☑ Consent given by the data subject
  - ☑ Compliance with a legal obligation to which the controller is subject
Task carried out in the public interest/exercise of official authority vested in the controller:
- Scientific or historical research purposes or statistical purposes
- Archiving of research materials and cultural heritage materials
- Processing carried out by public authorities for the performance of a task carried out in the public interest
- For the purposes of the legitimate interests pursued by the controller or by a third party
  Specify the legitimate interest:
- Performance of a contract to which the data subject is party

5. What kind of personal data does the University of Helsinki process?

The University of Helsinki processes the following personal data:

- **Data subjects employed by the University of Helsinki**
  - Personal data: name, employee number, date of birth, personal identity code, gender, nationality, workstation address, work email, work phone
  - Education, badges of merit and medals
  - Employment and salary details, taxation details, banking details
  - Assessment of job requirements and personal job performance
  - Monitoring of working hours and absences
  - Details used in the identity management and access restrictions of systems

- **Fee and grant recipients, researchers, docents, visiting professors and professors emeriti**
  - Personal data: name, employee number, date of birth, personal identity code, gender, nationality, workstation address, email
  - Education
  - Fee criteria and salary details, taxation details, banking details
  - Details used in the identity management and access restrictions of the system

- **Persons performing non-military service and agency contract workers**
  - Personal data: name, employee number, date of birth, personal identity code, gender, work unit
  - Monitoring of working hours and absences
  - Details used in the identity management and access restrictions of the system

- **External parties attending training**
  - Personal data: name, employee number, date of birth, personal identity code, gender, nationality, workplace address, email, phone
  - Education
  - Details used in the identity management and access restrictions of the system

6. Special (sensitive) personal data

Health data and trade union membership data are processed in the HR systems. With consent given by the data subject, trade union membership data are used to collect membership fees, while health data are processed to fulfil the duties of the University of Helsinki and exercise the specific rights of its employees (including occupational healthcare).
7. From where do my personal data originate?

Personal data originate from the following sources:
- Data subject
- Authorities and insurance companies
- Decisions related to human resources administration
- University of Helsinki human resources system SAP HR
- Payroll system Visma Personec F
- Mobile monitoring of working hours
- Academic administration information systems (such as Oodi)
- University of Helsinki identity management system and staff role register HERO

8. Who can access your data and to whom are your data disclosed?

At the University of Helsinki, the right to collect and process personal data is granted to those individuals whose professional duties so require, such as supervisors and HR Services staff. Personal data must be processed in an appropriate, confidential and secure manner. Access to your personal data is protected with usernames and passwords, as well as through data communications and information networks protected by role-based access control. Paper documents and printouts are stored in locked facilities and cabinets.

Data contained in the data file are regularly transferred to the following databases of the University of Helsinki:
- Human resources system SAP HR
- Payroll system Visma Personec F
- YPJweb system
- SAP BPC/BW
- Sole TM working hour allocation system
- SAP FICO financial management system
- Identity management system (IAM) and staff role register HERO
- University of Helsinki data repository (for statistics and reporting)

Data can also be transferred to other University information systems as well as disclosed to authorities, employer and employee organisations, insurance companies, banks, subcontracted companies and consultants within the limits set by valid legislation and to the extent required by the provision of services, including Kela, providers of occupational health and travel agency services and the Finnish Education Employers association. The University of Helsinki is also responsible for the processing of your personal data in cases where it has outsourced parts of the processing to a processor of personal data in accordance with the GDPR.

9. How long will personal data be stored?

Storage periods for data are described in the archiving plan of the University of Helsinki: [https://flamma.helsinki.fi/content/res/pri/HY358990](https://flamma.helsinki.fi/content/res/pri/HY358990) (in Finnish only).
The storage periods are based on the Archives Act (831/1994) and other relevant legislation, as well as the University of Helsinki’s guidelines and archiving plan. Personal data are only stored for as long as they are needed. Most common storage periods: Employees’ employment contract data are stored for at least 10 years after the termination of employment and payroll data for 50 years. However, working hour monitoring data are only stored for two years. In the case of applicants to professorships for whom assessor statements have been requested, application documents are stored permanently for scientific research purposes.

10. Transfer of data outside the EU or the European Economic Area

Data will only be transferred outside the EU or the EEA in cases where legislation, tax treaties or social security agreements stipulate that employer obligations pertaining to the employee are to be implemented outside the EU or the EEA.

11. Your rights and related derogations

In matters related to the rights of the data subject, the contact person is the person stated in section 1 of this statement.

**Withdrawal of consent (Article 7 of the GDPR)**

If the processing of personal data is based on consent, you have the right to withdraw your consent. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

**Right of access (Article 15 of the GDPR)**

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed and which details are being processed. You may also request a copy of the personal data undergoing processing.

**Right to rectification (Article 16 of the GDPR)**

If there are inaccuracies in your personal data being processed, you have the right to request their rectification or completion.

**Right to erasure (Article 17 of the GDPR)**

You have the right to request the erasure of your personal data on the following grounds:

a) The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

b) You withdraw the consent on which the processing is based, and there are no other legal grounds for the processing;

c) You object to the processing (the right to object is described below), and there are no overriding legitimate grounds for the processing;

d) The personal data have been unlawfully processed; or
e) The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The right to erasure does not apply if:

a) The erasure of data renders impossible or seriously impairs the achievement of the objectives of the processing in scientific research; or
b) The processing of personal data is necessary for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject; or
c) The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

**Right to restriction of processing (Article 18 of the GDPR)**
You have the right to restrict the processing of your personal data under the following conditions:

a) You contest the accuracy of your personal data, in which case the processing will be restricted for a period enabling the University to verify the accuracy of the personal data.
b) The processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead.
c) The University no longer needs the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims.
d) You have objected to the processing (see details below), pending verification of whether the legitimate grounds of the controller override those of the data subject.

**Right to data portability (Article 20 of the GDPR)**
You have the right to receive the personal data concerning you, which you have provided to the University, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the University, if:

a) The legal grounds for the processing are based on consent or a contract; and
b) The processing is carried out by automated means.

When exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

**Right to object (Article 21 of the GDPR)**
You have the right to object to the processing of your personal data if the processing is based on public interest or legitimate interests. In such cases, the University can no longer process your personal data unless the University demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or if it is necessary for the establishment, exercise or defence of legal claims. The University can also continue processing your personal data when necessary for the performance of a task carried out for reasons of public interest.
**Right to appeal**

If you consider that the processing of your personal data has been carried out in breach of valid data protection legislation, you have the right to appeal to the Office of the Data Protection Ombudsman

Contact details:

Office of the Data Protection Ombudsman  
Street address: Ratapihantie 9, 6th floor, 00520 Helsinki  
Postal address: PO Box 800, 00521 Helsinki  
Phone (switchboard): 029 56 66700  
Fax: 029 56 66735  
Email: tietosuoja@om.fi