DESCRIPTION OF PERSONAL DATA FILE as required by the Personal Data Act (523/99), section 10

Version adapted to conform with the Personal Data File/Description created on 1 January 2000
Description updated on 17 May 2018
The description also includes the information specified in section 24 of the Personal Data Act.

<table>
<thead>
<tr>
<th>1. Controller of the data file</th>
<th>Name</th>
<th>University of Helsinki</th>
</tr>
</thead>
<tbody>
<tr>
<td>Postal address</td>
<td>PO Box 53 (Fabianinkatu 28)</td>
<td></td>
</tr>
<tr>
<td>Postal code</td>
<td>00014</td>
<td></td>
</tr>
<tr>
<td>Phone</td>
<td>University of Helsinki +358 2941 22400</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Coordinator or contact person of the data file</th>
<th>Head, Student Register</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sari Zitting</td>
<td></td>
</tr>
<tr>
<td>Phone</td>
<td></td>
</tr>
<tr>
<td>+358 2941 22234, +358 2941 22400</td>
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</tr>
</tbody>
</table>

| 3. Name of the data file | University of Helsinki system for academic administration |

| 4. Purpose of processing personal data | Administration concerning students and studies, including monitoring the payment of membership fees of the University of Helsinki Student Union and student nations as well as issuance of extracts and certificates concerning studying and studies to students. Other purposes include the provision of address services, the compilation of statistics and the performance of academic research. |

The use of the register is based on legislation concerning the University of Helsinki and organisations active in the University community. The (primary) legislation and regulations are listed in section 7 as well as below:

- Universities Act (558/2009, amendments included)
- Government Decree on University Degrees (794/2004, amendments included)
- Regulations of the University of Helsinki
- Regulations on Degrees and the Protection of Students’ Rights at the University of Helsinki
- Standing orders of University of Helsinki faculties

<table>
<thead>
<tr>
<th>5. Content of the data file (group/groups of data subjects and relevant data or data groups)</th>
<th>1. The student’s basic details</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Personal identity code</td>
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<tr>
<td></td>
<td>Student number, which serves as the student’s identifier at the University instead of the personal identity code</td>
</tr>
<tr>
<td></td>
<td>OppijaID (national student ID)</td>
</tr>
<tr>
<td></td>
<td>Username</td>
</tr>
<tr>
<td></td>
<td>Name</td>
</tr>
<tr>
<td></td>
<td>Contact details</td>
</tr>
<tr>
<td></td>
<td>Gender</td>
</tr>
<tr>
<td></td>
<td>Nationality and, in the case of international students, country of origin</td>
</tr>
<tr>
<td></td>
<td>Language information (native language, language of communication, language of schooling)</td>
</tr>
<tr>
<td></td>
<td>Domicile</td>
</tr>
<tr>
<td></td>
<td>Date of entry in student records</td>
</tr>
<tr>
<td></td>
<td>Register number</td>
</tr>
<tr>
<td></td>
<td>Information on attendance and non-attendance for each academic year</td>
</tr>
<tr>
<td></td>
<td>Doctoral student’s estimate on the full- or part-time status of studies (as of 1 May 2015)</td>
</tr>
<tr>
<td></td>
<td>Membership of the Student Union</td>
</tr>
<tr>
<td></td>
<td>Membership of a student nation</td>
</tr>
<tr>
<td></td>
<td>Student’s former names and the corresponding dates</td>
</tr>
<tr>
<td></td>
<td>Information if the student has died</td>
</tr>
<tr>
<td></td>
<td>Permission to disclose data</td>
</tr>
</tbody>
</table>
2. The student's right to study
- Data about the student's faculty, degree programme, major subject and study track
- Status of the student's right to study (primary, secondary, etc.)
- Scope of the student's right to study (bachelor's studies, master's studies, postgraduate research or professional studies, non-degree studies, Open University studies)
- Validity of the student's right to study and any extensions
- Quota for the student's right to study
- Route of the student's right to study (e.g., right to complete a degree based on Open University studies or a vocational qualification)
- Data about the institution that awarded the student's right to study
- Data about the student's liability to pay a tuition fee
- Data about fee-based commissioned training
- Data about the student's status as a transfer student

3. Studies completed by the student
- Type of completed studies (e.g., a course or module, a transferred credit or a master's thesis)
- Completion date
- Scope in credits
- Approver
- Grading
- Language of completion
- Structure of modules (courses included in modules)

4. Degrees completed by the student at the University of Helsinki
For each degree completed by the student at the University of Helsinki, information appearing on the degree diploma will be stored:
- Degree
- Degree programme
- Study track
- Major subject
- Completion date
- Approver (faculty)
- Scope in credits

5. Degrees completed by the student outside the University of Helsinki
The following data will be stored about the student's previous degrees (incl. the matriculation examination) that served as the grounds for the student's right to study:
- Degree
- Educational institution that awarded the degree
- Completion date of the degree

6. The teacher's/administrator's basic details
The following data will be stored about the teacher or the person entitled to use the system of academic administration:
- Personal identity code
- Personal code
- Name
- Contact details
- Work unit
- Position or title
- User rights for the system

7. Information on registration for courses and examinations
- Identifying information on courses and examinations
- Identifying information on the course teacher or examination administrator
- Identifying information on the registered students

8. Information on the student's personal study plan

- Information on the student’s right to study
- Information on planned modules and courses
- Information on objectives and assessment recorded by the student in the plan
- Information on completed studies
- Information on supervisors
- Feedback from supervisors

9. My Studies/My Teaching

The user’s Oodi registration information as well as the teacher’s information is displayed in the My Studies/My Teaching service.
- The service saves the profile image selected by the user as well as the background image for the service.
- The profile image and the background image are used in the Portfolio tool as well as Opinder.

The student can use the Portfolio tool on My Studies to create a public profile. The profile includes the following:
- Information on degrees, work experience and language skills as well as other information the student wishes to provide
- Information on completed studies and other information the user has selected to be displayed
- The user’s profile image as well as the background image

10. The following information is stored in the Thessa tool for student guidance and supervision:

- An assessment of the student's current stage of studies
- Publications
- Participation in conferences and other events
- Planned and completed studies

The student records the above information, or the information is retrieved from Oodi or the Tuhat research database.

### 6. Regular sources of data

- The student’s enrolment information (basic information, information on the right to study, degrees serving as the grounds for the right to study) is obtained from the national applicant register maintained by the Finnish National Agency for Education (Act 884/2017) and the OILI system for student enrolment as well as from the documents submitted by the student.
- Information on student attendance is obtained from the student’s notification or, during the registration period, from the banks which accept payments of the Student Union fees.
- Information on membership of the Student Union and student nations is obtained from the student’s notification or, during the registration period, from the banks that accept payments of the Student Union fees.
- Information on the right to study and on degrees is obtained from faculties.
- Information on completed studies is obtained from faculties and departments.
- Information on Open University students and studies is obtained from the Open University’s units and summer universities. Information on the basic details and right to study of Open University students is transferred to Oodi from the Open University’s Eduweb registration system.
- Information on the basic details and right to study of incoming international exchange students is transferred to Oodi from the University of Helsinki’s Mobility Online system for international exchange.
- Some changes to basic details are made based on the student’s own notification.
- Students can use WebOodi to update their contact details, pay the Student Union’s membership fees, register for attendance or non-attendance, and register for examinations and courses.
- Updates of basic details (personal identity code, first names, last name, domicile, native language, gender, address) are obtained from the Population Register.
7. Regular disclosure of data and the transfer of data outside the EU or the European Economic Area

The data in the data file are documents in the public domain as specified by the Act on the Openness of Government Activities (Act No 621/1999), and:

- May upon request be provided for viewing
- May upon request be issued under sections 13 and 16 of the Act on the Openness of Government Activities
- If considered confidential, may be provided for viewing, or a copy of the document may be issued only 1) with the consent of the party concerned, 2) to the party concerned, or 3) by virtue of the law.
- In the case of a personal identity code, may be disclosed for purposes of updating address data and for the prevention of redundant postal traffic, provided that the identity number is already available to the recipient (Personal Data Act, section 13, subsection 3)

Information on the right to study, registration, degrees and completed studies included in the student registers of higher education institutions is collected for central storage and use in a national data warehouse, which allows such information to be securely offered through a technical connection for use by a student admissions register and the student admissions services shared by institutions of higher education (Applicant and Matriculation Examination Registers Act No 884/2017).

In the cases provided for by the law, the University of Helsinki discloses student data as follows:

- The institution of higher education discloses student data using a technical connection through the national data warehouse for higher education for use by the student admissions register (Act No 884/2017, section 26).
- The Ministry of Education and Culture uses the data in the student register of the institution of higher education for an assessment of education and research as well as for development, the compilation of statistics and the production of other datasets required by monitoring and supervision through the national data warehouse for higher education (Act No 884/2017, section 26).
- Student data are disclosed to Statistics Finland (Statistics Act 280/2004, section 15) as a machine-readable record either directly or through the national data warehouse for higher education.
- Student data are disclosed to the National Supervisory Authority for Welfare and Health either directly or through the national data warehouse for higher education (Act No 559/1994 on Health Care Professionals, Decree No 564/1994 on Health Care Professionals).
- Student data are disclosed through the national data warehouse for higher education for the purposes of monitoring, statistics and research to the tracking surveys commissioned by the Aarresaari network of university career and recruitment services (e.g., career tracking and doctoral tracking), other tracking surveys commissioned by the University of Helsinki with its partner universities, and tracking surveys commissioned by the Ministry of Education and Culture.
- Student data are disclosed as a machine-readable record either directly or through the national data warehouse for higher education to Kela for the purpose of deciding on matters involving student financial aid (Student Financial Aid Act 65/1994, section 41).
- Student data are disclosed as a machine-readable record either directly or through the national data warehouse for higher education to Kela (Act No 644/2003 on Pension Compensation Paid from State Funds for Periods of Care of a Child under Three Years or of Studies, Government Decree No 1146/2004 on Pension Compensation Paid from State Funds for Periods of Care of a Child under Three Years or of Studies) to determine the pension accrued during studies. Kela discloses the data further to the Finnish Centre for Pensions (Decree No 1146/2004, section 5).
- Student data are disclosed to employment authorities, Kela or unemployment funds (Act No 1290/2002, Act No 1295/2002) for the purpose of deciding on the receipt of a labour market subsidy and unemployment allowance.

- Membership data are disclosed as a machine-readable record to the University of Helsinki Student Union (Universities Act No 558/2009) for the purpose of elections of the Representative Council as well as mailing Ylioppilaslehti magazine and producing student ID cards.

- Student data are disclosed to University of Helsinki student nations (Universities Act No 558/2009, membership data of student nations).

- Student data are disclosed as a machine-readable record either directly or through the national data warehouse for higher education to the Finnish Student Health Service for the purpose of student health care under the Primary Health Care Act (No 66/1972).

- Student data are disclosed for scientific research (Act No 621/1999 and Act No 523/1999). The person requesting the data must explain to the data file controller the purpose of using the date, describe other matters necessary to establish the conditions of disclosing the data and, if necessary, outline how the data will be protected. Student data can be disclosed for research purposes either directly by the University or through Statistics Finland's FIONA environment for remote access to research data. The data are transferred to FIONA from the national data warehouse for higher education.

Data about new students are automatically transferred on a daily basis to the user account register of the University of Helsinki's IT Centre for the creation of new computer user accounts; the same applies to data about registration for attendance or non-attendance and the expiry of the right to study.

Data about applicants for international student exchange are transferred to the University of Helsinki's Mobility Online system for the management of international mobility.

Data about those completing studies under the agreement on flexible minor subject studies at Finnish institutions of higher education are transferred according to the agreement to the partner institution.

The basic details of doctoral students and information on the right to complete a doctoral degree are transferred to the University of Helsinki’s TUHAT research database.

The basic details of students included in the University of Helsinki’s HowULearn feedback system, as well as information on their right to study, studies and degrees, are transferred to the system.

Information on students at the Faculty of Science is transferred to the Faculty’s system for monitoring student progress.

Basic details of students completing specialist education in medicine or dentistry, as well as their contact information, specialist field and licentiate degree in medicine or dentistry, are transferred to the ERHA system for the management of specialist education.

The basic and registration information of students in courses using the University of Helsinki’s Moodle learning environment is transferred to Moodle.

With the consent of the data subjects, the University may disclose their address data to certain purposes that support studies. The consent may be cancelled or amended later in WebOodi or using a form available from Student Services.

Students can consent to the disclosure of their name and address details:
- For purposes that support studies to associations and foundations, professional organisations and mainly regional authorities for the mailing of information that
• Relates to the student’s duties or rights as a member of the University community or
• Is intended to promote studies, professional skills or employment or
• Is intended to improve the conditions of study or work or
• Is intended to promote the students’ connections to their home region;
• For other purposes that support studies, such as small-scale surveys or opinion polls as well as direct marketing in cases in which the person responsible for the Student Register considers the disclosure of data possible
• For career and recruitment purposes (purposes approved by the University of Helsinki career or recruitment services)
• To the Helsinki University Library (incl. personal details and information on the right to study)
• To UniSport (incl. personal details)
• To the University of Helsinki alumni register (incl. information on completed degrees)

The University observes good registration practice and requires that those requesting the disclosure of data have an appropriate connection to the target group whose data are requested.

The system of academic administration includes not only the technical basic data file (currently Oodi, to be gradually replaced with Sisu), but also separately maintained sub-files that are both digital and manual. A computer printout from the personal data file is considered a part of the above. Consequently, the disclosure of personal data based on a printout from a digital system is considered the disclosure of data from a personal data file.


Information collected through cookies and other technologies can be used in the interfaces separately developed for the basic data file to target information content for users.

Information obtained through cookies and other technologies is anonymous, used only for the above purposes and not combined with other information.

Data on students will not be transferred outside the European Union or the European Economic Area.

8. Principles for protecting the data file

In the processing of data in the file, care will be taken not to unduly compromise the privacy of students.

A. Manual data

• Manual data will be stored and protected in a manner securing them against unauthorised access, accidental or unlawful destruction, manipulation, disclosure, transfer or other unlawful processing.
• In each unit, employees will have access only to those data on the students that are required to complete their work tasks.
• Trainees or students working in the operational unit are entitled to view student data they need in their tasks, but if a student wishes to use student data for his or her thesis or dissertation, it constitutes the disclosure of the data to a third party.
• Data on student admissions, study rights and degrees will be stored in accordance with the archiving regulations of the University of Helsinki.
• Copies of diplomas will be permanently stored at faculties.
• The student register unit at University Services will store student data in locked rooms or transfer the data to the University’s central archives for permanent storage.
• Outdated documents will be disposed of by shredding.
B. Digital data

- Data saved in the Oodi system will be stored on University of Helsinki computers. Data in the Sisu system, which will gradually replace Oodi, will be stored on servers provided by Tieto Oy, the system service supplier’s (Funidata Oy) subcontractor, in the EU or EEA. Data about study rights, registration, degrees and completed studies will be transferred daily and also stored in the national Virta data warehouse maintained by the Ministry of Education and Culture (Act No 884/2017).
- Access to the system is permitted only with user identification.
- Computers and the databases are protected with passwords.
- Connections between the data file and workstations have been protected from access by outsiders.
- Staff usernames and passwords will be granted by a coordinator at the student register unit following the receipt of a written application signed by the relevant unit’s supervisor.
- The user account shall be restricted to either viewing rights or updating rights depending on the employee’s work assignment.
- Basic details and information on registration and completed studies can be edited only by University of Helsinki staff who have been granted the relevant user rights. Information on completed studies can also be edited by the course or module teacher.
- Students can use WebOodi with a valid user account for the University systems; they do not need a separate user account.
- The Oodi service centre of the University’s IT Centre is responsible for the technical maintenance of the Oodi system under a separate agreement and has authorised specific staff to access the system databases. Funidata Oy is responsible for the technical maintenance of the Sisu system under a separate agreement and has authorised specific staff to access the system databases.
- The authorised staff of the Oodi service centre and Funidata as well as staff of the student register unit will monitor the use of the system.
- University of Helsinki archiving regulations provide for the archiving of the data in the data file.
- In other respects, the provisions of the Personal Data Act (523/1999), the Act on the Openness of Government Activities (621/1999) and the regulations of the University of Helsinki on the processing and protecting of personal data as well as on access control and the use and locking of facilities will apply.

Section 48 of the Personal Data Act provides for penalties for personal data offences, breaking into a personal data file and for violations of confidentiality.

Right of inspection

- Students have the right to inspect their personal details in the data file unless otherwise provided by the Personal Data Act.
- Requests must be made in person or in writing (signed in person).
- Requests must be addressed to the Student Register (see address above).
- The data may be disclosed in writing, if so requested.
- The right of inspection can be exercised free of charge once a year.
- Degree students can request a free-of-charge unofficial transcript of studies through WebOodi, when necessary.
- Degree students can receive one free official transcript of studies from Student Services (address below) per term; other official transcripts are subject to a fee.

Data rectification

- Students themselves can correct their contact details through WebOodi or notify changes to the University’s Student Services: https://www.helsinki.fi/en/studying/contact-us
- Other incorrect data in the data file can be corrected at the student’s request.
  - Written specific requests can also be submitted via email.
  - The requests must clearly state and justify the data that should be corrected, what the student considers correct data and how the correction is requested to be made.
  - Requests to rectify data about completed studies should be addressed to the department that approved the studies.
  - Requests to rectify data about study rights should be addressed to the faculty that granted the right in question.
  - Other rectification requests should be addressed to the Student Register (address above) or sent via email to opiskelijarekisteri@helsinki.fi.
- The data will be corrected without undue delay.
<table>
<thead>
<tr>
<th></th>
<th>If the request to rectify the data is denied, a written certificate to this effect will be issued to the student, who is entitled to take the matter for decision to the data protection ombudsman at the following address: Office of the Data Protection Ombudsman, PO Box 315, 00181 Helsinki. The applicant may submit a written complaint to the ombudsman. A form available from the office of the data protection ombudsman can also be used.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The data protection ombudsman may order the controller of the file to rectify the data.</td>
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</tbody>
</table>