

Privacy notice for data subjects
The Learning Centre customer register

This notice contains information required by Articles 13 and 14 of the General Data Protection Regulation of the EU.

Name of the register:	The Aalto University Learning Centre register of customers
Date:	20 June 2019
Controller, contact person and person in charge of the register	<p>Aalto University Foundation Postal address: P.O. Box 11000, FI-00076 AALTO Street address: Otakaari 24, 02150 Espoo Tel.: (exchange) 09 47 001</p> <p>Contact person and person in charge of the register: Service manager; Learning Services team leader. Phone: +358 50 373 2233</p>
Data protection officer and contact details	<p>Aalto University data protection officer Postal address: P.O. Box 11000, FI-00076 AALTO Street address: Otakaari 24, 02150 Espoo Tel.: (exchange) 09 47 001 Email: dpo@aalto.fi</p>
Purpose of the register, legal basis for processing personal data	<p>The purpose of processing personal data in the register is to maintain information on the customers of Aalto University Learning Centre and on their borrowed library material.</p> <p>The email addresses in the register are used to invite customers to participate in customer satisfaction surveys. The surveys are conducted at two-year, or greater than two-year intervals.</p> <p>The right of Aalto University to process information on the data subject (i.e. the person in the register to whom the personal data pertains) is based</p> <ul style="list-style-type: none"> • on its public-interest duty to provide Learning Centre services to Aalto University students • on making or performing an agreement on behalf of all customers in using the services • on its legitimate interest in certain cases where a customer fails to meet his or her obligations.

<p>A: Is personal data collected directly from the data subject?</p>	<p>Yes.</p>
<p>B: Is personal data collected from a source other than the data subject?</p>	<p>Yes. Aalto University student register Aalto University employee register</p>
<p>Information contained in the register (description of data subject categories and personal data categories)</p>	<p>The following personal data is necessary and processed in the register: Data on new students transferred from the student register to provide lending services: - personal identification number - last name - first names - street address - postal code - mobile phone - email address Data on customers who use Learning Centre lending services:</p> <ul style="list-style-type: none"> • customer name • personal identification number • postal address • telephone number • email address • customer category (e.g. staff customer, student customer) • entry on statistical category (e.g. Aalto University student, external student). • library card number • data on the customer's current loans • data on accrued late fees • data on the customer's reserved items • data on debt collection (if necessary) <p>Data on new students will come directly from the student register as of the academic year beginning 1 August 2019. Data on students who began prior to 1 August will come from the student register after the student gives consent.</p> <p>Otherwise, customer data is obtained when reported by the customers themselves.</p> <p>Data on Aalto University staff may be checked in the university's HR system, when necessary.</p>
<p>Recipients or categories of recipients of the personal</p>	<p>Personal data is processed only by those Aalto employees or those contracted individuals working on behalf of Aalto who have a right to process the data.</p> <p>Aalto University may also use outside parties to process personal data for Aalto on the basis of a commission contract.</p>

data (i.e. disclosure of personal data)	<p>Recipients of the personal data (according to activity):</p> <ul style="list-style-type: none"> • The National Library of Finland (system support) • CSC – IT Center for Science (system service maintenance) • Paytrail online payment service (if a customer pays late fees online) • collection agency (if a debt is turned over to it)
Transfer of personal data to third countries	<p>The data protection policy of the university is to exercise particular care if transferring personal data outside the EU and EEA to countries that do not offer the level of data protection required by the European General Data Protection Regulation (GDPR). Transfers of personal data outside the EU and EEA are done in accordance with the requirements of the GDPR.</p>
Period for which personal data is stored / Criteria used to determine this period	<p>The periods for which personal data saved in systems and manual material may be stored are based on law and on the records management plan of Aalto University. The storage periods for this personal data file are as follows:</p> <ul style="list-style-type: none"> • Customer data is stored for as long as the customer uses Learning Centre services, or for as long as the customer has outstanding obligations, such as unreturned loans, unpaid late fees or debts that have been turned over to a collection agency for handling. • In other cases, the data is erased three (3) calendar years after the customer's last transaction.
Rights of the data subject	<p>Right to review data</p> <p>You have the opportunity to review data on yourself by going to the Finna self-service portal (https://aalto.finna.fi/?lng=en-gb). There you can correct the data on yourself according to the instructions.</p> <p>You have a right to know what personal data is being processed on you and what data on you has been stored. The university will provide you with your data upon request without undue delay. The requested data and any additional related information will be provided within one month of the request, unless the request is wide-ranging and complicated, in which case the deadline may be extended by two months.</p> <p>Right to rectification of data</p> <p>You have a right to have any inaccurate or incomplete personal data concerning yourself rectified or supplemented without undue delay. In addition, you have the right to request that any unnecessary personal data on yourself be erased.</p> <p>Right to object to processing of personal data</p> <p>In certain situations, you have the right to object to the processing of your personal data, i.e. to request that it not be processed at all. When the data processing involves the performance of a task in the public interest, the exercise of</p>

the official authority vested in the controller, or the realisation of a legitimate interest of the controller or of a third party, you may object to the processing on grounds relating to your particular situation.

Right to be forgotten

You may have the right to have your personal data erased from a university register, depending on the legal basis for the data processing. This right shall not apply to cases where data processing is necessary for compliance with a legal obligation or for a task carried out in the exercise of official authority vested in the university. The storage and erasure of data shall comply with the records management plan of the university and the data storage periods required by legislation.

Right to data portability

You shall have the right to receive the personal data you provide to the university, and receive it in a structured, commonly used and machine-readable format, as well as the right to transmit the data to another controller without hindrance from the university. This right shall apply only to situations where the processing is carried out by automated means and is based on consent or contract.

You can exercise your right by contacting the Aalto data protection officer (dpo@aalto.fi)

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data relating to you infringes the General Data Protection Regulation (EU) 2016/679. In addition, you have the right to use other administrative or judicial remedies.

You have the right to bring court proceedings against the controller or the organisation processing your personal data if you consider that the processing of your personal data infringes the General Data Protection Regulation.