

# Tampere University's privacy notice for career monitoring

Enters into force on 1 June 2025

The University of Tampere and Tampere University of Technology merged on 1 January 2029 and became Tampere University. Together, the new Tampere University (Tampere University Foundation sr) and Tampere University of Applied Sciences Oy form the Tampere Universities community. Both higher education institutions act as independent data controllers in matters related to their personnel.

### How do we process your personal data?

We process your personal data to conduct career monitoring surveys. The purpose of career monitoring surveys is to track graduates' early careers and their labour market position and utilise the survey data in research, the development of higher education and study guidance. The survey is carried out after five years of graduation with persons who have completed a master's degree in any field or the bachelor's degree in early childhood education and after three years with persons who have completed a doctoral degree. In the career monitoring survey, this data are produced and used without identifying individual respondents. The data are utilised at the university level, in inter-university cooperation, and in collaboration with partners (e.g. trade unions).

Tampere University's career monitoring survey register concerns individuals who have completed a master's degree, a so-called terminal bachelor's degree or a doctoral degree.

### Do we use automated decision-making or profiling?

We do not engage in automated decision-making or profiling.



#### What personal data do we process?

The career monitoring surveys are conducted using both paper and electronic response forms. The electronic response form is implemented through the Arvo service, which is an education administration data service maintained and developed by CSC – IT Centre for Science. The collection of research data via paper forms and the compilation of the data are coordinated by the TUPA statistical research services of Tampere University. The register includes identifiers, background data, and survey responses, which are compiled by CSC and TUPA on behalf of Tampere University. The data include:

- a) form ID/online response number and time of response
- b) identification data, which are not stored with the responses and are only used for managing the target group and mailings, as well as for compiling background variables
  - a. first name, surname, personal identity code, possible date of death
  - b. postal address, postcode and telephone number
  - c. student number, student identification code (VIRTA code)
- c) background variables stored together with the responses. This includes data related to the study right and the completed degree targeted by the survey, such as the level of the degree, main subject, year of admission and graduation, tuition fee liability, thesis grade and grading scale, as well as respondent-related information such as gender, age, nationality and first language.

Respondents who wish to get more information about where the survey results are published can provide their email address as they respond to the survey. The email address is stored separately from the survey responses in a register maintained by Tampere University.



### Why can we process your personal data?

The processing of personal data is based on Article 6(1) of the GDPR, point (c): processing is necessary for the performance of a task carried out in the public interest (evaluation and development of university education, Universities Act 2009/558, Sections 2 and 87, and producing related statistics). Decree of the Ministry of Education and Culture on the Calculation Criteria for Universities' Core Funding (119/2019).

## Where do we obtain the personal data required for processing?

The respondents' background variables and identifying data are centrally retrieved from the national VIRTA Higher Education Achievement Register and, where necessary, supplemented with data from the universities' student information systems (main subject, faculty).

Address data: Population Data System / Digital and Population Data Services Agency. Telephone numbers: From the consumer data in the Service Database of Suomen Asiakastieto Oy. Email addresses: From Tampere University's student and/or alumni register, as well as email addresses provided by the respondents themselves. Response data is obtained from the answers submitted by the survey participants. Respondents may complete the survey either on paper or online. The data from paper forms is entered into an electronic system by TUPA statistical research services at Tampere University on behalf of the University. The paper forms submitted by respondents are sent directly to TUPA for registration. After registration, the forms are forwarded to Tampere University, which stores them for 10 years. The purpose of storing them is to allow verification of the digitised version in case of suspected data entry errors. The paper forms are destroyed 10 years after their digital registration.

### Processors and disclosures of your personal data

Your data is processed in information systems for the purposes for which they were originally collected. The data may also be used for statistical and research purposes. Data used for statistical or research purposes is generally anonymised so that individuals cannot be identified. The data are stored in accordance with appropriate data security requirements.

The processing of personal data in the register has been outsourced under a service agreement: On behalf of Tampere University, the register is processed by the University's statistical research services (TUPA) and CSC – IT Centre for Science Ltd. CSC is responsible for selecting the target group, enriching contact information, generating response links, collecting electronic responses and reporting the combined dataset. During the data collection phase, CSC processes personal data and handles the survey data without direct identifiers



when reporting the results. CSC transfers personal data (contact details, background variables and response identifiers) to TUPA for the purposes of disseminating the survey, issuing reminders and analysing the data. The University sends out the email invitations, for which TUPA provides the response and VIRTA identifiers. Tampere University's statistical research services (TUPA) coordinate the implementation of the career monitoring survey and processes personal data for disseminating the survey, and analysis and reporting. TUPA provides each university with its own dataset and shares the national dataset with the Aarresaari network (a collaboration of university career and employment services) and CSC for national-level reporting of the survey. Tampere University's dataset is obtained directly via the Arvo system interface. Datasets may be shared with partners (such as professional associations) for research purposes, excluding any personal data that could be directly linked to identifiable individuals.

### Do we transfer your personal data outside the EU/EEA?

Personal data are not transferred outside the EU/EEA.

### How long do we keep your personal data?

The retention periods for personal data stored in information systems and for manual records are based on legislation and the University's information management plan (TOS). Data that enables the identification of respondents is retained in the register only until the data has been combined, after which it is destroyed following data processing. TUPA and CSC retain datasets from different years without direct identifiers for a period of 10 years for the purpose of compiling time series. Tampere University retains its own datasets (both electronic and paper-based) from different years without direct identifiers for the same purpose, also for 10 years.

The university also retains data with identifiers in its own sub-register for a maximum of five years.

### What rights do you have as a data subject?

- Right of access (Article 15)
  - You have the right to know what personal data is being processed about you and what data has been stored about you. In many systems related to admissions, you can view the data stored about you when you are logged in.
- Right to the rectification of data (Article 16)



You have the right to ask that incorrect, inaccurate or incomplete personal data concerning you is rectified or completed without undue delay. You also have the right to demand that your unnecessary personal data are erased.

• Right to be forgotten (Article 17)

Depending on the basis for data processing, you may have the right to have your personal data erased from the University's register. Such a right does not exist, for example, in cases where the processing of your personal data is necessary for compliance with a legal obligation or for the exercise of official authority vested in the University (Article 17, paragraph 3b).

• Right to restriction of processing (Article 18)

In certain situations, you may have the right to request that the processing of your personal data be restricted until your data or the basis for processing it has been duly checked and corrected or supplemented.

Right to data portability (Article 20)

You have the right to receive the personal data you have provided to the University in a structured, commonly used, and machine-readable format, and the right to transmit those data to another controller without hindrance from the university. This right applies in situations where the processing is carried out by automated means and is based on consent or a contract.

The right does not apply, for example, to processing that is necessary for the performance of a task carried out in the public interest or for compliance with a legal obligation the controller is subject to. Therefore, this right generally does not apply to the University's personal data registers.

• Right to object (Article 21)

Based on your personal, specific situation, you have the right to object at any time to the processing of your personal data when the processing is based on the performance of a task carried out in the public interest, the exercise of official authority, or the University's legitimate interest. In such cases, your data may only continue to be processed if there is a compelling and legitimate reason for the processing that can be demonstrated.

Right to lodge a complaint with a supervisory authority (Article 77)

You have the right to lodge a complaint with a supervisory authority if you find that the processing of your personal data violates applicable data protection legislation. You also have the right to seek other administrative and judicial remedies.



Office of the Data Protection Ombudsman, P.O. Box 800, 00531 Helsinki, E-mail: tietosuoja@om.fi

Tel. 029 566 6700

www.tietosuoja.fi

#### **Enquiries about personal data protection**

If you have questions about the realisation of your rights as a data subject, please send email to the University's official email address tau@tuni.fi or send a letter to

**Tampere University** 

FI-33014 Tampere University

### Controller responsible for processing your personal data

Tampere University Foundation sr

FI-33014 Tampere University

Kalevantie 4, 33100 Tampere

Business ID 2844561-8

### Contact person in matters related to the register

The contact person in matters related to the register is Senior Specialist Hanna-Leena Hietaranta-Luoma, Education and Learning, Services for Educational Leadership, 33014 Tampere University opintopalaute.tau@tuni.fi.

#### **Data Protection Officer**

The Data Protection Officer can be contacted via email sent to dpo@tuni.fi.