

1 April 2025

Study Counselling Psychologist Services

## Data privacy notice

This data privacy notice tells you how we process your personal data in compliance with data protection legislation. In data protection legislation, the term 'data subject' refers to the person whose personal data are processed. In this privacy notice, we use the pronoun 'you' of data subjects.

This data privacy notice may be updated or edited if necessary. You will be notified of any significant changes as mandated by data protection legislation.

This data privacy notice came into force on 1 April 2025.

### 1. Controller and contact details of Data Protection Officer

The controller of your personal data is:

Tampere University Foundation sr. (Tampere University)

Business ID: 284451- 8

Kalevantie 4, FI-33100 Tampere

In data processing matters, your contact person is Simo Ahonen whom you can reach by email [simo.ahonen@tuni.fi](mailto:simo.ahonen@tuni.fi). The phone number of Tampere University's switchboard is +358 (0) 294 52 11.

If you have general questions about data protection, please email our Data Protection Officer at [dpo@tuni.fi](mailto:dpo@tuni.fi).

### 2. Scope and purpose of data processing

A personal data registry called 'study counselling psychologist services' is formed when we process your personal data. Personal data are processed as part of the study counselling psychologist service (individual working, group meetings). Anonymised statistical data are processed to develop the study counselling psychologist service.

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The purpose of processing personal data is to carry out study counselling psychologist services that support the students' learning, studying, study ability and wellbeing during the studies. The study counselling psychologist service provides the guidance stipulated by Section 40 of the Universities Act. It is not a health service.

The study counselling psychologists keep a client register of individual guidance sessions and comparable work, and record matters and events related to guidance. This practice is since study counselling psychologists are professional health care workers and apply applicable legislation in their work as psychologists.

### 3. Lawful basis for processing personal data

The lawful basis for processing your personal data is:

- ☒ consent of the data subject (group meetings)
- ☐ contract
- ☒ controller's legal obligation
- ☐ protection of vital interests
- ☒ public interest or the exercise of official authority
- ☐ legitimate interests of the controller or a third party

In case special categories of personal data (such as health or criminal offence data) are processed, the lawful basis for processing is

- ☒ explicit consent (of the data subject)
- ☐ protecting vital interests when the data subject is physically or legally incapable of giving consent
- ☐ establishing, exercising or defending legal claims
- ☒ processing is necessary for reasons of substantial public interest (Article 9.2 g) or processing is mandated by legislation or is due to legislation that directly binds the controller (sec 6, para 1 of Data Protection Act)

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☐ another basis that complies with data protection legislation and is specified in national legislation

#### 4. Sources and types of personal data

Depending on the circumstances, we may collect personal data either directly from you or from other sources. We collect personal data from:

☒ you as the data subject

In addition, study counselling psychologists keep a record of guidance sessions and related tasks and events, such as summaries, recommendations and statements.

☐ the following regular data sources:

We process the following types of personal data:

☒ General personal data: first name, surname, personal ID code, address, telephone number, email address

☒ Special category data (sensitive personal data):

☒ Health data: health-related data told by the client

☐ Racial or ethnic origin

☐ Political opinions or religious/philosophical beliefs

☐ Trade union membership

☐ Sexual behaviour or orientation

☐ Genetic data

☐ Biometric data processed for unique identification

☐ Data on criminal convictions or offences

☐ Technical data:

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☒ Other data: degree programme, date of starting current studies, guidance session appointments with the study counselling psychologists and cancellations

We will process data on the following categories of data subjects:

☐ Employees ☒ Students ☐ Research participants ☐ Researchers ☐ Others:

Providing personal data is neither a legal nor a contractual obligation.

## 5. Transfer and disclosure of personal data

Under certain circumstances, your personal data may be transferred to a third country or an international organisation located outside the European Union (EU) or the European Economic Area (EEA). During such transfers, personal data will be appropriately protected by employing suitable transfer mechanisms (such as standard contractual clauses) and technical measures.

☒ Your personal data will not be transferred outside the EU/EEA

☐ Your personal data will be transferred outside the EU/EEA as follows: The transfer mechanism and protective measures are: \_\_\_\_

☒ Your personal data will not be regularly disclosed to other controllers under data protection legislation.

☐ Your personal data may be disclosed to other controllers under data protection legislation as follows: \_\_\_\_.

With the client's consent, data may be disclosed to an authority that has a legal right to get such data if they request it in writing. The request must specify the legal basis for the right to obtain data. Without the client's consent, data may be disclosed if the provision of such data or the right to obtain them is specifically legally mandated. Data may also be disclosed with the client's explicit consent.

In some cases, your personal data may also be processed by data processors with whom we have signed appropriate data processing agreements.

## 6. Protecting personal data

Your personal data will be protected using appropriate technical and organisational measures, including antivirus software, fire walls and regular software updates. Users who can access personal data are required to log in with a username and password or, in some cases, with multi-factor authentication. The personal data collected by Study Counselling Services are processed via a secure system that collects a log of persons who have viewed the data.

We will also protect your data through organisational measures. Our staff are obligated to maintain confidentiality, and access to data is internally restricted. Client data can only be processed by persons who deal directly with the client. Client data collected by an intern study counselling psychologist may also be processed by the study counselling psychologist who is responsible for their supervision.

If necessary, we will implement additional safeguards to protect data, such as separate storage locations. Any physical documents will be safeguarded by storing them in locked facilities.

## 7. Retention period for personal data

We will retain your personal data for only as long as necessary, as determined on a case-by-case basis. The retention period also depends on legal obligations: we will adhere to our Data Management Plan and all applicable legislation when determining the retention period of personal data.

Your personal data will be retained as follows:

- Data on individual counselling: 4 years at the most
- Data on group counselling: 1 year at the most
- Individual group counselling: 4 years at the most
- Data on client visits collected before 2022: retained on paper in accordance with the Data Management Plan and destroyed after the storage period, which is generally 4 years after the last entry.

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## 8. Profiling and automatic decision-making

Your personal data will not be used for profiling or automated decision-making purposes.

## 9. Data subjects' rights and how to exercise them

Data protection legislation affords certain rights to data subjects, depending on the lawful basis for processing their personal data. Under certain circumstances, your rights may be restricted, for example, due to our legal obligations or if personal data are processed for scientific research, statistical or archiving purposes. If your rights have been restricted, we will implement appropriate and necessary technical and organisational measures to protect your privacy. As a data subject, you have the following rights which you can exercise by sending us a request at [dpo@tuni.fi](mailto:dpo@tuni.fi). Contact [opintopsykologit.tau@tuni.fi](mailto:opintopsykologit.tau@tuni.fi) to rectify any erroneous data.

### Right of checking personal data (right of access)

You have the right to request confirmation of whether we hold your personal data and to receive a copy of the data we hold.

### Right to the rectification of data

You have the right to request that any incorrect or incomplete personal data we hold about you be revised or supplemented. You can also request to have any unnecessary personal data erased from our records.

### Right to erasure

You have the right to request the erasure of your personal data from our records (right to be forgotten). However, this right does not apply to data processed for the purpose of fulfilling a legal obligation.

### Right to restrict processing

You may have the right to restrict the processing of your personal data in certain cases defined by law. For example, this right may apply if you believe the personal data we hold

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about you is incorrect or that your data are being processed in violation of data protection legislation, or if you have opposed the processing of your data.

#### Right to object

In certain circumstances, you have the right to object to the processing of personal data on grounds relating to your particular situation.

#### Right not to be subject to automated decision-making

You have the right not to be subject to decisions based solely on automated processing (such as profiling) that produce legal effects concerning you or otherwise similarly and significantly affect you. However, there are exceptions to this prohibition.

#### Withdrawing consent

If your personal data are being processed based on your consent, you have the right to withdraw your consent at any time.

#### Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority (Data Protection Ombudsman) if you consider that the processing of your personal data violates applicable data protection legislation.

Office of the Data Protection Ombudsman

Street address: Lintulahdenkuja 4, 00530

Helsinki Postal address: PL 800, 00531

Helsinki, Finland

Switchboard: +358 29 566 6700

Registry: +358 29 56 66735

Email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)