



**Privacy Notice – Human  
Resources Services of  
Tampere University of Applied  
Sciences**

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## Processing of personal data

Tampere University of Applied Sciences Ltd and Tampere University (Tampere University Foundation) together constitute a higher education community. Each higher education institution acts as an independent data controller in respect of its own personnel.

### Why do we process your personal data?

Tampere University of Applied Sciences requires the processing of your personal data for human resources and employment relationship matters, the processing of job applicant data, and the administration of resource agreements and fees, as well as to carry out the employer's tasks and fulfil the employer's obligations. Tampere University of Applied Sciences uses the data contained in the register when carrying out tasks concerning the data subjects that are assigned to it under applicable laws, collective agreements and separate decisions and provisions. Such tasks include:

- workforce planning and budgeting of personnel costs
- recruitment, processing of job applicant data, processing of personnel assessments, and internal job arrangements
- internal communications
- onboarding
- working time monitoring and allocation
- administration of employment relationship information
- determining pay, including assessment of job demands and appraisal of individual work performance
- payment of salaries and fees
- management of resource agreements
- assessment and development of competence and support of workplace learning
- providing guidance on, producing materials for, and developing the Objective and competence discussion process
- arranging occupational health care and promoting work ability and well-being at work
- occupational safety and health duties (equality, non-discrimination, occupational accidents, the early support model, risk assessment, workplace surveys)
- rewarding employees (service awards, etc.)
- administration of overseas assignments

- carrying out tasks related to the lifecycle of the employment relationship
- management-related measures, such as hearings and the issuing of warnings
- statistics, reporting and management control

## What is the lawful basis for processing your personal data?

The processing of personal data is primarily based on legislation applicable to Tampere University of Applied Sciences and on the data subject's consent. Tampere University of Applied Sciences is entitled to process personal data of its personnel on the following grounds:

### **Employees of Tampere University of Applied Sciences:**

- performance of a contract to which the data subject is party
- compliance with a legal obligation to which the controller is subject
- performance of a task carried out in the public interest and/or exercise of official authority vested in the controller: scientific or historical research or statistical purposes
- legitimate interests pursued by the controller or by a third party: reporting required by funders, competence mapping
- the data subject's consent

### **Persons who are not in an employment relationship, such as fee recipients:**

- compliance with a legal obligation to which the controller is subject
- performance of a contract to which the data subject is party
- the data subject's consent

Special categories of personal data: Trade union membership data are used with the data subject's consent for the collection of membership fees, and health data are processed in order to comply with Tampere University of Applied Sciences' obligations and to exercise the specific rights of its employees (such as occupational health care).

### **Key legislation:**

Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, GDPR)

Data Protection Act (1050/2018)

Universities of Applied Sciences Act (932/2014)

Employment Contracts Act (55/2001)

Occupational Safety and Health Act (738/2002)

Collective agreement (Sivista)

Act on the Protection of Privacy in Working Life (759/2004)

Act on the Openness of Government Activities (621/1999)

Working Hours Act (872/2019)

Annual Holidays Act (162/2005)

Public Sector Pensions Act (81/2016)

Act on Keva (66/2016)

Statistics Act (280/2004)

Workers' Compensation Act (459/2015)

Communicable Diseases Act (1227/2016)

Cooperation Act (334/2007)

Occupational Health Care Act (which defines the employer's duty to provide occupational health care) 1383/2001

#### **Other applicable regulations:**

Rules of Procedure of Tampere University of Applied Sciences

Degree Regulations of Tampere University of Applied Sciences

Personnel Regulations of Tampere University of Applied Sciences

## **What personal data do we process?**

#### **Data collected from applicants in connection with recruitment:**

- name, email address, telephone number, place of residence (municipality/city), country
- degree and education details
- previous work experience
- language skills
- for statistical purposes: gender, nationality (Finland/Other (if other: continent)), how you learned about the vacancy, and whether you have previously worked for us

- any recruitment-specific information and attachments requested, such as a CV and a video interview recording

**Employees of Tampere University of Applied Sciences:**

- name, personnel number, date of birth, personal identity code, gender, nationality, workplace address, work email address, work telephone number
- education details
- employment and payroll information, bank account details
- assessments of job demands and individual work performance
- working time monitoring and absence information
- information used for user administration and restricting access rights in systems

**Fee recipients:**

- name, date of birth, personal identity code, gender, nationality, email address
- education details
- fee basis and payment information, bank account details
- information used for user administration and restricting access rights in systems

**Personal data belonging to special categories (e.g. health data):**

In HR systems, absence information is processed (the code indicating the reason for sickness absence). Health data are not processed in the personal data systems.

In the early support system provided by the occupational health partner (for which Tampere University of Applied Sciences Ltd acts as the controller), the following are additionally processed: dates of sickness absences, dates relating to rehabilitation benefits granted by earnings-related pension insurance companies, minutes of work ability discussions and negotiations, notes related to the implementation of the substance use programme, and treatment commitments.

The processing of special categories of personal data is based on the supervisor's duty of care (Occupational Safety and Health Act) and the employer's obligation to provide sickness absence information to occupational health care.

## How do we collect your data?

Personal data may, depending on the situation, be collected either directly from the individual concerned or from other sources. Data are obtained from:

- the data subject
- authorities and insurance companies
- HR administrative decisions
- the university of applied sciences' recruitment and HR systems
- Tampere University of Applied Sciences' user management system
- sickness absence certificates

## How do we process your data?

Your data are processed in systems for the purposes for which they were collected. Data may also be used for statistical and research purposes. Data used for statistical or research purposes are, as a rule, anonymised so that an individual person cannot be identified. Data are stored taking appropriate information security requirements into account.

## To whom do we disclose your data?

Data may be disclosed to units within the university of applied sciences as necessary.

Within Tampere University of Applied Sciences, personal data may be collected and processed by those whose duties require it, e.g. supervisors and employees of HR services, and by the IT Services of Tampere University.

Data are regularly disclosed to the following recipients:

authorities, trade unions, insurance companies, banks, Kela (the Social Insurance Institution of Finland), providers of occupational health care services and travel agency services, the Ministry of Education and Culture, Sivista, providers of printing and online payroll services, and providers of employee benefits.

## Transfers of personal data outside the EU and the EEA

The data protection policy of the Tampere higher education community (Tampere University of Applied Sciences and Tampere University) is to exercise particular care where personal data are transferred outside the EU and the European Economic Area (EEA) to countries that do not provide a level of protection in accordance with the GDPR. Any transfer of personal data outside the EU and the EEA is carried out in compliance with the requirements of the GDPR.

## How long do we retain your personal data?

The retention periods for personal data stored in systems and for manual materials are based on applicable legislation and the institution's information management plan. The retention periods are defined in the information management plan of Tampere University of Applied Sciences.

Retention periods are based on other applicable legislation as well as the guidelines and information management plan of Tampere University of Applied Sciences. Personal data are retained only for as long as they are necessary for the purposes for which they are processed. Employment contract data and payroll records of employees are retained for 50 years; however, for example, documents related to the early support model are retained for 5 years.

## Your rights as a data subject

### **Right of access (right to obtain access to your personal data, Article 15)**

You have the right to know what personal data concerning you are being processed and what data concerning you have been recorded. In several of the institution's systems you can, when logged in, view the data recorded about you yourself.

### **Right to rectification (Article 16)**

You have the right to request that inaccurate, incorrect or incomplete personal data concerning you be rectified or completed without undue delay. In addition, you have the right to request the erasure of personal data concerning you that are no longer necessary.

### **Right to erasure ('right to be forgotten', Article 17)**

Depending on the lawful basis for processing, you may have the right to have your personal data erased from the institution's register. This right does not apply, for example, where the processing of your personal data is necessary for compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the institution.

### **Right to restriction of processing (Article 18)**

In certain situations, you may have the right to request the restriction of the processing of your personal data for the period necessary to verify and duly rectify, complete or otherwise correct your data or the lawful basis for processing.

### **Right to data portability (Article 20)**

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

This 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. Accordingly, as a rule, this right does not apply in relation to the institution's personnel registers.

**Right to object (Article 21)**

Based on your personal and particular situation, you have the right at any time to object to the processing of your personal data where the lawful basis for processing is the performance of a task carried out in the public interest, the exercise of official authority, or the legitimate interests of the institution. In such a case, your data may be processed further only where there are compelling and legitimate grounds 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 the supervisory authority if you consider that the processing of your personal data infringes Regulation (EU) 2016/679 (GDPR). In addition, you have the right to use other administrative remedies and judicial remedies.

**[Office of the Data Protection Ombudsman](#)**

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