Privacy notice – AI tools at Tampere University Teacher Training School

This notice explains what happens to your personal data when you use artificial intelligence (AI) tools approved by Tampere University Teacher Training School. Use the account your school provides. Follow your teacher's instructions about what you can do with each tool and what information you can enter. If you have questions about your data, ask your teacher or email dpo@tuni.fi.

This notice gives you the information that data protection law requires us to provide about how we process your personal data. The legal term for a person whose data is processed is "data subject". In this notice, "you" means the data subject and "we" means the data controller.

We may update this notice when needed. If we make a significant change, we will let you know as required by law.

This privacy notice took effect on 11 November 2026.

1. Controller

Your personal data is controlled by

Tampere University Foundation sr (Tampere University)
2844561-8
Kalevantie 4, 33100 Tampere, Finland

If you have questions about how we process your data, contact Eeva Niemelä at eeva.m.niemela@tuni.fi. You can also call the University switchboard on +358 (0) 294 52 11.

For general questions about data protection, contact the Data Protection Officer at dpo@tuni.fi.

2. Scope and purpose of data processing

If you are a pupil in basic education or a student in general upper secondary education at Tampere University Teacher Training School, we process your personal data when school-approved AI tools are used in teaching. We call this activity "Use of AI tools in teaching at the Teacher Training School". This notice also covers staff involved in using these tools in teaching.

We process personal data so that you can complete assignments as part of the curriculum, practise using digital tools and AI, and get support for your learning. We need the data to identify users, manage access, enable users to complete assignments and share them with a limited group, and keep the services secure.

Section 10 describes Adobe Express for Education and Microsoft 365 Copilot Chat in more detail. The Teacher Training School's general privacy notice explains how the school processes personal data in its other activities. The privacy notice for users of centralised IT resources explains how the University processes data relating to your TUNI account and centralised IT services. You can find both notices on the Tampere University privacy notices page.

3. Lawful basis for processing personal data

We process your personal data on the following legal basis.

☒ Compliance with a legal obligation to which the controller is subject

We process the personal data needed to provide education under Article 6(1)(c) of the General Data Protection Regulation (GDPR). Our duty to provide education is set out in the Universities Act, the Basic Education Act and the Act on General Upper Secondary Education. We use only the data needed for this purpose.

By signing the acceptable use agreement, you agree to follow the rules for using the services. If a separate, voluntary activity requires your consent to process personal data, we will explain the activity and ask for your consent separately.

4. Sources and types of personal data

Depending on the circumstances, we collect personal data from you or from other sources. We obtain data from the sources marked below.

☒ You, the data subject

☒ Other regular sources. The school's user account system receives basic details about pupils and students from the school's pupil and student register. We also receive data from permitted teaching materials shared by teachers and other users. The services generate technical usage data and logs when you use them.

We process the following categories of personal data.

☒ General personal data**:** your name, school email address, unique user ID, and information about your service account and access rights.

☒ Technical data: your IP address, device and browser information, and logs relating to sign-in, use of the service and security.

☒ Other data: the content of your assignments, the prompts you enter, any permitted attachments and the responses the AI gives you. Adobe Express also processes images, audio and video, subject to the limits described in section 10.

Only material needed for an assignment may be saved in these services. Do not enter health data, other sensitive information, personal identity codes or information about criminal offences into AI tools. Your teacher will explain what materials you may use in each service.

We process data about people in the groups marked below.

☒ Employees ☒ Students ☐ Research participants ☐ Researchers ☒ Other: pupils in basic education. “Students” means general upper secondary school students. “Employees” means staff involved in using these tools in teaching.

To use a service yourself, you need a school account. The service also needs information from the school’s user account system to identify you and determine what you can access. Without these details you cannot use the service. This is a condition of using the service. No law specifically requires you to give your personal data to a particular AI service. We process the data necessary to provide education as part of the legal duty described in section 3. You do not need to tell an AI tool about private matters or give it personal data that is unnecessary for the assignment.

5. Transfer and disclosure of personal data

In some circumstances, your personal data may be transferred to countries outside the European Union and the European Economic Area (EU/EEA) or to international organisations. When we transfer data, we use an appropriate transfer mechanism, such as standard contractual clauses, and technical safeguards to ensure an adequate level of protection.

☒ Your personal data is transferred outside the EU/EEA as described for each service in section 10. Remote access from outside the EU/EEA for technical support may also constitute a transfer of personal data. Depending on the transfer, we rely on an adequacy decision of the European Commission or on standard contractual clauses together with any additional safeguards needed. You can ask for more information about transfers and a copy of the applicable safeguards by emailing dpo@tuni.fi.
A service provider may also process some data as a controller in its own right. Section 10 explains these purposes for each service and tells you where to find the relevant privacy information. The use described in this notice does not include publishing schoolwork for the general public.

Service providers process your personal data on our behalf under our data processing agreements.
At school, teachers and staff responsible for user accounts, system administration and security process your data as needed for their work. Only people who need the data for their duties can access or view it. The service providers and their subprocessors handle the technical operation

of the services. Schoolwork is shared only with the intended group, following the teacher's instructions.

6. Protecting personal data

We use appropriate technical and organisational measures to protect your personal data. These include antivirus protection, a firewall and regular software updates. We require a username and password at sign-in and, in some circumstances, two-step verification.

Staff who process personal data must keep it confidential. We limit access according to each person's duties. Only people with the appropriate access rights can administer user accounts and services. The school gives users guidance on handling personal data and schoolwork securely.

If we have any paper records, we keep them in locked premises.

You use the services with an account and access rights managed by the school. The school explains how to use the services and share materials. The rules for each service also apply when you do schoolwork at home.

7. Retention period for personal data

We keep your personal data for as long as needed in each case. Legal requirements also affect how long we keep it. We follow our records management plan and the applicable legislation.

For these services, the following retention periods apply. We keep assignment materials for as long as needed to complete the assignment, give feedback and assess the work, where applicable. We keep data needed for assessment or for another statutory retention requirement in the location designated by the school, in line with its records management rules. When your access ends, your school sign-in access is disabled and any content that is no longer needed is deleted from the service in line with the school's deletion policy. Section 10 describes how each service retains and deletes data. The privacy notice for users of centralised IT resources gives the retention periods for central user account management and sign-in services.

8. Profiling and automated decision-making

When these tools are used in teaching, we do not use your personal data for profiling or automated decision-making.

Your teacher is responsible for teaching and assessment. AI does not make decisions about your assessment or other aspects of your education. The privacy notice for users of centralised IT resources explains how accounts and access rights are created automatically. Section 10 describes how service providers process data for their own purposes.

9. Data subjects' rights and how to exercise them

You have the right to know how we process your personal data and to exercise the rights described below. Which rights apply depends on the purpose and legal basis for processing. A legal duty to keep data may limit your right to have it erased.

To exercise your rights, contact the person named in section 1 or email the Data Protection Officer at dpo@tuni.fi. We will verify the identity of the person making the request. Children have the same data protection rights as adults. Depending on the child's age and level of development, a guardian may exercise these rights on the child's behalf or together with the child. We will respond without undue delay and within one month at the latest. If we need up to two more months to deal with the request, we will tell you within the first month and explain why.

Right of access

You have the right to know how we process personal data and to access the personal data we hold about you.

Right to rectification

You have the right to ask us to correct inaccurate personal data or complete any missing details. You can also require us to erase personal data that is no longer needed.

Right to erasure

In certain circumstances, you can ask us to erase your personal data. This is also known as the right to be forgotten.

We will keep data to the extent that we still need to process it to meet a legal obligation.

Right to restriction of processing

You can ask us to restrict the use of your personal data in circumstances specified by law. For example, you can do so if you dispute the accuracy of your data, or if the processing is unlawful and you want us to restrict its use instead of erasing it.

Right not to be subject to automated decision-making

You have the right not to be subject to a decision based solely on automated processing, including profiling, if it has legal effects on you or affects you in a similarly significant way. The law provides for exceptions to this rule.

Right to lodge a complaint with a supervisory authority

If you believe your personal data has been processed in breach of data protection law, you have the right to lodge a complaint with Finland's supervisory authority, the Data Protection Ombudsman.

Office of the Data Protection Ombudsman
For current contact details and instructions on how to bring a matter to the Data Protection Ombudsman, visit the Ombudsman's website.

10. Information about each service

Adobe Express for Education

How you use the service and what data it processes. You can use Adobe Express to create graphics, presentations, web pages and videos. With the Firefly AI features that the school allows, you can, for example, generate images and edit their content. The service processes account details, project content, AI prompts and responses, and technical usage data and logs. Do not use the AI features with images of identifiable pupils. Outputs from these features are not used to assess pupils.

The provider and its roles. Adobe Systems Software Ireland Limited provides the service. Adobe uses group companies and subprocessors to deliver it. Adobe also processes data for its own maintenance, security, analysis and development purposes under the applicable terms. It acts as a separate controller for those purposes. For more information, see the Adobe Privacy Policy.

Data transfers. For the use described in this notice, Adobe stores user content in the EU. Identification and licensing data is also processed in the United States through services provided by Adobe Inc. Technical support may involve remote access from countries including the United States and India. Transfers to Adobe Inc. that fall within the scope of its certification rely on the European Commission's adequacy decision for the EU–US Data Privacy Framework. Other transfers rely on the applicable standard contractual clauses and any additional safeguards needed.

Retention. The retention criteria in section 7 apply to schoolwork. Ending your school sign-in access does not automatically delete content saved in Adobe. Deleting user profiles and projects that are no longer needed is a separate step. For technical usage data and logs that Adobe processes for its own purposes, the retention period depends on why Adobe uses the data. These purposes include keeping the service secure, preventing misuse and meeting legal obligations.

Microsoft 365 Copilot Chat

How you use the service and what data it processes. You can use Copilot Chat to chat with AI, draft and edit text, and get help with your learning, following your teacher's instructions. You sign in to your Tampere University organisational account using your school TUNI credentials. The service processes your account identifiers, the prompts you enter, permitted attachments, AI responses, and technical usage data and logs.

You use the service in teaching groups designated by the school, under your teacher's guidance and in line with the service's age limits. Your teacher will tell your group which features and materials you can use.

The provider and its roles. Microsoft acts as a processor for the prompts you give Copilot Chat and the responses it generates, under the terms agreed with Tampere University. If web search is enabled, Microsoft acts as a separate controller for the search queries generated for Bing. For details, see the Microsoft Privacy Statement.

Data transfers and retention. Microsoft's EU Data Boundary commitments to store and process data in the EU and EEA apply to Copilot Chat prompts and responses. Some processing falls outside these commitments. For example, Bing web searches and certain processing needed to provide support or operate the service may take place outside the EU/EEA. Transfers outside the EU/EEA are protected by the mechanisms described in section 5. Conversations are saved in your chat history, and attachments may be saved in your OneDrive. The retention criteria in section 7 apply to assignment materials. Deleting conversations and attachments is a separate step. Even after you delete a conversation from your history, some data may remain for a time under the organisation's retention policies or because of legal obligations.