

**Privacy Policy** 

**Data Protection Notice** 

## **Data Protection Officer:**

The Data Protection Officer is Vellu Taskila, Administrative Planner at the Finnish Student Unions' Association (Suomen opiskelijakuntien liitto). Contact information: vellu.taskila@samok.fi, +050 389 1013.

# List of Personal Data Registers:

• JäsRek - Membership Register, provided by Hakosalo Software Oy.

• Visma Fivaldi - According to the Accounting Act. The system includes all individuals who have received payments or salaries/compensation.

• File folders containing personal and contact information of trusted officials and tutors, as well as a register of former members of the student union. The student union manages the distribution and deletion of information regarding past events.

# **IT Policy / Information Security Practices**

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Processing of Personal Data at Southeastern Finland University of Applied Sciences Student Union Kaakko

**General Information:** 



Personal computers and systems are accessed using personal credentials. Additionally, computer antivirus software is kept up to date.

## **Data Protection Notice**

Employees processing personal data have been trained on the changes brought by the General Data Protection Regulation (GDPR), and all employees have successfully completed Xamk's online courses "Fundamentals of Data Protection" and "Key Principles of Data Protection." The courses were provided to Xamk by Granite. Written agreements on data processing have been made with individuals processing personal data.

## **Membership Register**

An external company maintains the membership register, and its servers are located in Finland. Members provide their own information, which is verified and updated from Xamk's information systems. Each user has personal login credentials for the membership register. The login credentials are only given to individuals who need the information for their work. An appendix on data protection compliant with the GDPR has been updated with the company providing the service. Resigned members are immediately removed from the membership register after approval in a Kaakon board meeting. Former members who have not paid their membership fees are removed from the register when their right to study ends or when they graduate from Xamk, or at the latest, two years after their membership becomes inactive. After removal, only information about membership fees remains in the register, which cannot be attributed to any natural person. Information from the membership register is not transferred outside the EU and EEA. Information from the membership register may be disclosed for marketing purposes within the EU and EEA for those members who have consented to the disclosure. If a member leaves this section on the membership application form blank, it is interpreted as not granting permission.

Joining as a member is done through a secure connection via an electronic form.

#### **Survival Kit Borrowers**

Paper forms/agreements for borrowing Survival Kits are stored in a locked office until the deposit is returned. Afterward, the paper forms are destroyed as confidential waste, and a scanned copy remains as an attachment/receipt for bookkeeping. Information is not disclosed to third parties.

# Student Cards and Orders/Procurement of Student Cards

Plastic chip-enabled student cards are ordered centrally from a Finnish card manufacturer. The order is made through the membership register. The necessary personal information for card production and the individual's photo (information to be included on the card) are provided to the card manufacturer, taking into account data security. The disclosure of information is based on the fact that the student wants to order a student card for themselves and gives permission to provide their information to the card manufacturer.



## Processing of Personal Data related to Representative Elections

In accordance with the University of Applied Sciences Act, all members of Kaakko are eligible to vote in the representative elections. Information about the upcoming election, the start of candidate nominations, and the voting method is communicated to the members through the opiskelijakuntakaakko.fi website.

Electronic voting is conducted through the voting application in the membership register. Access credentials for the electronic voting system are automatically provided to all members through the system. Election officials at the polling station are granted access rights to the membership register, allowing them to view only the necessary member information for conducting the election.

The elections are conducted in accordance with the rules and election guidelines of the Student Union Kaakko. Members running for representative positions grant Kaakko the right to publish candidate lists, candidate photos, other essential election information, and publicly announce the election results. All published information, except for the results, is obtained directly from the candidates themselves.

# Data Protection Notice:

#### **Tutor Register**

Kaakko implements tutoring activities on behalf of Xamk. The information of tutors is collected through Xamk's forms for the implementation of tutor training and mentoring. The information is stored in a file folder provided by Xamk, which is accessible only to Kaakko staff. The access rights to the folder are managed by the Student Union Kaakko's expert in tutoring and guidance.

Tutoring is a study module that grants credits, and the issuance of credits is carried out by Xamk, requiring the transfer of tutor information to Xamk's contact person.

#### **Other Processing of Personal Data**

Visma Fivaldi is used as the financial and payroll management system. The processing of personal data in the system is based on, among other things, the Accounting Act. The system uses strong authentication, and access to the system is granted only to individuals who need the information for their work.

A GDPR-compliant data protection appendix has been updated with the company providing the service for payroll and accounting. Payroll and accounting tasks are outsourced to an external company, and a GDPR-compliant data protection appendix has been updated with the service provider.

#### **Data Protection Supervision and Related Measures**



We follow the PDCA model (Plan-Do-Check-Act). In all operations, a secure model is planned from the perspective of data protection, with proper agreements in place. Once the systems are in use, any deviations related to data protection are monitored and investigated. A record is kept of detected deviations, and if necessary, the affected parties are notified. If the deviation is such that it needs to be reported to the authorities, the report is made as quickly as possible. Efforts are also made to promptly address and resolve any issues, while taking measures to avoid potential new problems.

## Handling of this Document

This document is publicly available on the opiskelijakuntakaakko.fi website. Changes to the document do not require a decision from the board meeting. When updating the document, a log entry is added at the end of the document, listing the three most recent changes, the date of the change, and the justification for the change.

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## **Document Updates / Log File**

• June 22, 2023, at 14:57, Sauli Sarjus. Translated the Privacy Policy into English.

• May 24, 2018, at 11:05, Lauri Tuohiniemi. Added a mention that a written agreement has been made regarding personal data.

• December 2, 2019, at 7:57, Anna-Maija Jukkara. Removed the newsletter and corrected the word "tuutori" to "tutori."