

1. Data Controller

Centria University of Applied Sciences Ltd
Talonspojankatu 2, 67100 Kokkola
Phone (06) 868 0200

2. Coordinator and contact person for register related matters

Coordinator: Kirsi Vuotila, Study Affairs Manager, phone 0447250040
Contact person: Elina Ovaskainen, main user, phone 0447250048

3. Contact details of the Data Protection Officer

Centria University of Applied Sciences Ltd, Data Protection Officer, Talonspojankatu 2, 67100 Kokkola,
Phone (06) 868 0200, email: tietosuojavastaava@centria.fi

4. Register name

Peppi – student administration, teaching and planning of studies system

The system comprises the following registers:

- Basic register (student register)
- Applicant register
- Planning of teaching
- Planning of studies
- Planning and allocation of resources
- Progress tracking

5. Purpose of processing personal data and data retention periods

Students, student study plans, completed courses and awarded grades as well as teachers and other staff at Centria University of Applied Sciences are registered in the basic register.

The purpose of the planning of teaching and studies registers is to produce curricula and the academic year plan, organise teachers' working time, organise studies, plan school events, design students' personal study plans as well as produce various certificates and reports related to teaching and study.

The basic register and the teaching and study planning systems are essential tools for Centria University of Applied Sciences to carry out its tasks and plan, implement, evaluate and monitor its activities. The registered individuals (students, teachers, other staff) are parties in matters related to Centria's student administration. Only data that is essential for Centria to plan and carry out its tasks is registered in the system.

Information on students' study plans (PSP) is held to safeguard the rights and interests of students. Tracking the progress of studies is utilized in guidance and counselling, various counselling situations and studies, and it is used to support the student's learning, planning and completion of studies.

Maintenance and use of the register is based on Centria University of Applied Sciences' degree regulations and legislation concerning universities of applied sciences:

- Universities of Applied Sciences Act (L932/2014)

- Government Decree on Universities of Applied Sciences (A1129/2014)
- Government Decree on Joint Application to Higher Education (A293/2014)
- Act on the National Registers of Education Records, Qualifications and Degrees (L884/2017)
- Student Financial Aid Act (L65/1994)
- Decree on Student Financial Aid (A260/1994)
- Personal Data Act (L523/1999)
- Act on the Openness of Government Activities (L621/1999)
- Administrative Procedure Act (L434/2003)
- Administrative Judicial Procedure Act (L586/1996)
- Decree on the Openness of Government Activities and on Good Practice in Information Management (A1030/1999)

Personal data retention periods are in accordance with filing plan requirements, and these requirements are accessible in Centria's internal document and records archive.

6. Categories of personal data in the register

Student details

- student ID
- national learner's ID (OID)
- last name, first names, name called by, (former last name)
- personal identity code, date of birth, gender
- nationality
- native language, language of communication, language of education
- contact details (address, phone number, email address)
- next of kin contact information
- home municipality, municipality of residence, country
- passport number for foreign students
- classification of education, degree programme/field of study, admission group
- form of education (full-time/part-time)
- campus
- language of instruction
- type of education
- degree, degree title, credits to be earned, required scope of studies
- educational background
- information on attendance, graduation and resignation, termination or dismissal from studies
- validity of right to study, maximum number of attending and non-attending semesters, semesters used
- Personal Study Plan (PSP/HOPS) and related details
- completed studies and grades, completed scope in credits, completion dates, assessors
- international mobility (study and work placement exchanges)
- progress of studies
- certificate entries, directives and qualifications
- information on payment of tuition fees

- organisational unit
- additional information on the right to study, information on transfer students
- consent to disclosure of data
- information on the student's personal study plan, PSP
 - plan for completion of studies
 - course enrolments
 - information on completed studies
 - recognition of prior learning (AHOT)
 - assessments and grades awarded
 - performance assessors
 - dates of completion
 - scope in credits of completed studies
 - progress of studies
 - communication between student and teacher
 - tutor-teachers and study counsellors

Applicant details

Applicant details obtained from Opintopolku/Oili system

(https://web.centria.fi/Data/content/OILI_tietosuojaaseloste.pdf)

- personal details of student (first names, name called by, last name, personal identity code, learner ID)
- address
- native language and language of communication
- nationality
- information on educational background
- information on study option and degree programme
- information on enrolment and payment
- information on consent to publish student admission result

Staff details

- name called by
- last name
- email address
- supervisor
- organisation code
- work site code
- cost unit code
- title
- user right restrictions
- employment relationship

Planning of teaching

- information on curricula
 - studies (study modules, courses, scheduling)
 - degree structure

- curricula
- information on academic year plan
 - planning of academic year
 - course implementations
 - teachers on implementations
 - teacher's resources on each implementation
- organisation of working time
 - annual working hours
 - periods of leave
 - time allocated to work-related tasks: teaching, guidance, RDI, administrative, other
 - electronically approved working hours plan
- implementation plan
 - description of implementation plan
 - evaluation criteria and evaluation methods
 - timetables, learning events and teachers

7. Regular sources of data

- National applicant register, Opintopolku, maintained by the Finnish National Agency for Education
- National OILI register maintained by the Finnish National Agency for Education
- Application forms by students from Open University (EduplanElla system)
- Enrollments of cross-institutional students from other Finnish universities (studies are based on the agreements with the organisations). The personal data of students is transferred through the national cross-study service channel (RIPA) or using Centria's separate application forms. In special cases the necessary data can be delivered from the partner school.
- Information on students from other studies is transferred through personal data forms.
- Student data is updated from termination and graduation notifications and right of study extension applications submitted by students.
- Information for updating student attendance information on new students is obtained from OILI. Continuing students complete an attendance notification in Peppi each academic year.
- Students can update their contact details in Peppi.
- Information in the staff register is updated by transferring employment contract details from the financial administration system.

8. Regular disclosure of data

Centria University of Applied Science's regular disclosure of data is in accordance with the right of public authorities to collect data as defined in various laws.

Information on the right to study in higher education, enrolment, degrees and completed studies included in the student registers of higher education institutions is collected for central storage and use in a national data warehouse (VIRTA) which allows such information to be securely provided through a technical user connection for use by student admissions registers and joint student admissions services of higher education institutions. Centria University of Applied Sciences may use the national data warehouse

in its other activities and in the disclosure of data to public authorities and other higher education institutions. (Act 884/2017, 23§)

Information through the national VIRTa data service is disclosed to:

- The Finnish National Agency for Education, Student admissions register (Opintopolku)
The Students Admissions Register is maintained by the Finnish National Agency for Education. Universities and universities of applied sciences participate in the register. Centria University of Applied Sciences discloses student information using a technical user connection through the VIRTa data service for use by the student admissions register and joint higher education student admissions services. (Act 884/2017, §23, §26).
- The Finnish National Agency for Education, National study credit, degree and qualification disclosure service (Koski service)
The Finnish National Agency for Education maintains a study and degree disclosure service into which data held in VIRTa is transferred in accordance with Act 884/2017, §25. The Koski service interface can be used by individuals to inspect and use their data in registers and warehouses as defined by Act 884/2017. The authorities obtain data from the service through a technical user connection. The Finnish National Agency for Education grants authorities with a statutory right to the processing of such data access to the connection.
- Ministry of Education and Culture
The Ministry of Education and Culture uses the information in the VIRTa data service to produce datasets for assessing, developing, compiling statistics, monitoring and supervising education and research (Act 884/2017, §26).
- Statistics Finland
Centria University of Applied Sciences discloses student data to Statistics Finland (Statistics Act 280/2004, §15) as a machine readable record either directly or through the VIRTa data service.
- KELA (The Social Insurance Institution of Finland)
Centria University of Applied Sciences discloses information in the student register to KELA (Student Financial Aid Act 21.1.1994/65) through the VIRTa data service: information on attendance and any changes to attendance, qualifications/degrees, termination of studies, and study monitoring data on students receiving student financial aid.
- Valvira (The National Supervisory Authority for Welfare and Health)
Centria University of Applied Sciences discloses information in the student register using a technical user connection through the VIRTa data service to Valvira (Act and Decree on Health Care Professionals L559/1994, A564/1994): completed degrees and qualifications, terminated studies and withdrawals of study rights for all professional groups under Valvira's supervision.
- University Admissions Finland consortium
Centria University of Applied Sciences discloses information in the student register using a technical user connection through the VIRTa data service to the University Admissions Finland consortium to enable higher education to carry out its statutory obligations: checking information

provided by applicants for international master's programmes who have given a Finnish higher education degree as background education. Personal details and information on study right, degree and completed studies required for application processing are retrieved from VIRTa using a technical user connection.

- **Follow-up surveys**
Centria University of Applied Sciences discloses information in its registers through the VIRTa data service on student performance for the purpose of monitoring, compiling statistics and research use (Personal Data Act §14, §15). Information on students and their studies is retrieved for background information in surveys related to monitoring, statistics and research. The follow-up surveys gather information that is utilised in higher education quality assurance and development of curricula, teaching and student guidance (studies and their fluency, employment of graduates and their placement in the workforce).
- **Statistics Finland's FIONA remote access service**
Centria University of Applied Sciences can decide to disclose information through the VIRTa data service for scientific research. Statistics Finland's FIONA remote access service is a secure research data processing environment. Direct identification of an individual is prevented in material entering the FIONA system. Public authorities, institutions, research project managers and individual researchers who have permission from their organisation to use FIONA may apply to access data in VIRTa. Disclosure of VIRTa data for research use in the FIONA remote access system requires a research permit granted by the Data Controller (Centria University of Applied Sciences).
- **TUUDO (Caleidon Oy)**
Students can consent to retrieve their own data from the TUUDO mobile application.
<https://static.tuudo.fi/privacy/fi/>

In addition, information is delivered as follows:

- **User management system**
Data is also transferred to Centria University of Applied Sciences' user management system for the purpose of maintaining usernames and creating work spaces in learning environments.
- **ATOMI – Certification service**
The necessary personal data needed for the documents produced in the ATOMI-certification service will be transferred from Peppi to ATOMI. In ATOMI-certification service, students can order various electronically signed documents for themselves. Electronic diplomas are also made through the service.
- **VALO - Graduation service**
The student applies for a diploma in the VALO-graduation service. VALO reads necessary information for the student's graduation from Peppi.
- **WIHI- Thesis project control and management system.**
Necessary personal data required to complete the thesis is transferred from Peppi to WIHI.

- **Study guide**
Curricula and course descriptions are transferred to the electronic study guide.
- **Data of cross-institutional students (requires agreements between the universities).**
The personal data of students is transferred through the national cross-study service channel (RIPA) based on the student's permission. In special cases, the data can be disclosed to partner schools in education programmes delivered cooperatively with other higher education institutions. In principle, only essential data is disclosed.
- **The selected data can also be recorded to and saved in temporarily stored files.** These files contain only the minimum amount of personal information, which Centria needs for its necessary purposes and responsibilities. The data will only be saved for the necessary time, and after that the data will be destroyed.

Information is disclosed to immigration and police authorities on request for the purpose of checking a student's residence permit.

Centria University of Applied Sciences exercises discretionary rights to disclose data for scientific purposes and surveys conducted by other organisations that are of benefit to Centria. The organisation must explain to the data controller the purpose of using the data and other details necessary to establish the disclosure conditions of the data. A research permit and plan are prerequisites for the disclosure of data.

Centria University of Applied Sciences observes good registration practice and requires that anyone requesting data disclosure has an appropriate connection to the target group whose data is requested. In accordance with the Personal Data Act, data may only be used for the purposes for which it is disclosed. Anyone using name and address information must always indicate the source of the information. Reports and statistics produced by Centria University of Applied Sciences for the purposes of planning, monitoring and evaluating its activities do not contain personal data.

9. Transfer of data outside the EU or EEA

Data in the register is not transferred outside the EU or the European Economic Area.

10. Principles of register protection

The Peppi system is intended solely for internal use at Centria University of Applied Sciences. The Peppi system is accessed through an internet browser with individual usernames and passwords. The server is located in Eduix Ltd's data room. Progress tracking information is located in the Microsoft O365 cloud service at Centria University of Applied Sciences.

Access rights to the system are restricted user group specifically. An individual's user rights may be extended, reduced or withdrawn, depending on changes to the employee's work assignment. User rights are withdrawn when the employee is no longer in the position for which the user rights were given. User rights are automatically withdrawn on termination of an employee's work contract or on termination of a student's right to study.

Users of the system can as defined by their user rights generate documents and reports from the system. Printouts and reports containing personal data are destroyed by shredding or as confidential waste.

11. Right of access

Students and employees have the right to access and inspect their personal information. Students may consent or object to the disclosure of their name and address information for the purpose of direct marketing and/or marketing of education. Students can correct their contact details through the student desktop in Peppi.

Anyone registered in the student register has the right to inspect their details in the data file and request copies of these details from the Student Affairs Office. Students can inspect some of the information through the student desktop in Peppi.

Anyone registered in the staff register has the right to inspect their details. Teachers are able to inspect some of these details through the teacher desktop in Peppi. Teachers may request a comprehensive inspection of their data from the person in charge of staff register related matters at their work site.

Students and teachers may inspect information registered on them. Students can inspect registered data and its correctness and accuracy. Students can inspect the correctness of their personal and study details from their personal Study Plan (PSP). Students can inspect and change in their PSP courses, enrol on courses, inspect completed studies and grades, credit accumulation and study progress. Students have the right to receive from the Student Affairs Office an official study certificate and transcript of studies.

12. Right of correction or erasure

On its own initiative or at the request of the registered, the Data Controller must without undue delay rectify, erase or complete personal data in the register which is incorrect, unnecessary, incomplete or outdated with regard to the purpose of the data processing. The Data Controller may, however, have other statutory obligations to continue processing of personal data, in which case the demand for erasure is denied.

The registered has the right to demand rectification of information. Student information which the student is unable to update him/herself will be corrected in the system in response to the student's demand. The person in charge of the Centria student data register corrects the information.

Information in the staff register will be corrected according to the data subject's demand. The person in charge of the Centria staff register corrects the information.