

1. Data Controller

Centria University of Applied Sciences Ltd
Talonpojankatu 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 of the Peppi system, phone 0447250048

3. Contact details of the Data Protection Officer

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

4. Name of the register

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

5. Basis for processing personal data, processors, purpose, and retention periods

The purpose of planning teaching and studying is to produce curricula, communication, academic year planning, teacher work time planning, study implementation plans, learning events, and students' personal study plans, as well as various certificates and reports related to teaching and studies.

Basis for processing personal data:

- Compliance with a legal obligation (General Data Protection Regulation Article 6.1 c)
- Task carried out in the public interest or in the exercise of official authority (General Data Protection Regulation Article 6.1 e)
- In certain cases consent (General Data Protection Regulation Article 6.1 a)

The basic register includes students of Centria University of Applied Sciences, their study plans, study achievements and their evaluations, as well as teachers and other staff.

The basic register and the planning system for teaching and studying are essential tools for Centria University of Applied Sciences for managing and planning operations, implementation, evaluation, and monitoring. The registered individuals (students, teachers, other staff) are stakeholders in matters related to Centria's study administration. Only information necessary for the planning and operation of the university is recorded in the system.

The information in the study planning (PSP) is maintained to ensure the rights and interests of the student.

Personal data is processed by teaching and guidance staff, student services, human resources, and financial administration staff in their work-related tasks. Additionally, data may be processed in other support services (security, IT services, communication). The university may use external personal data processors, such as companies providing system services, which process personal data on behalf of Centria University of Applied Sciences based on a contract.

The maintenance and use of the register are based on Centria University of Applied Sciences' degree and administrative regulations and legislation concerning universities of applied sciences.

Primarily, the processing is based on the following legislation:

- Universities of Applied Sciences Act (L932/2014)
- Government Decree on Universities of Applied Sciences (A1129/2014)
- Act on National Study and Degree Registers (L884/2017)
- Government Decree on Joint Application to Higher Education (289/2019)
- Administrative Procedure Act (434/2003)
- EU General Data Protection Regulation (2016/679) and complementary national regulations
- Act on Information Management in Public Administration (906/2019)
- Act on the Openness of Government Activities (L621/1999)

Retention periods for personal data are based on legislation and Centria's records management plan. The retention periods for materials are regulated by Sections 25§ and 27§ of the Act on National Study and Degree Registers (884/2017), decisions issued by the National Archives of Finland under Section 8§ of the Archives Act (831/1994), and recommendations from the Information Management Board.

6. Categories of personal data in the register

Student details

- student number, student ID
- national learner's ID (OID)
- last name, first names, name called by, (former last name)
- finnish 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, study group
- form of education (full-time/part-time)
- campus
- teaching language
- 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) 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
- funding, 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
 - assessments and grades awarded
 - performance assessors
 - dates of completion
 - scope in credits of completed studies
 - progress of studies
 - tutor-teachers and study counsellors
 - recognition of prior learning, application attachments and additional information
 - study-related records, agreements, and communications
- Other information necessary for teaching and guidance

Applicant details (obtained from Opintopolku/Oili system)

- personal details of student (first names, name called by, last name, personal identity code, learner ID)
- address
- native language, language of communication and language of education
- 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
- unit 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

- Studyinfo, the national applicant register maintained by the Finnish National Agency for Education
Updating the national learner ID and the students' changed address and municipality-of-residence information (from the Population Information System) for those students who have a valid study right or whose study right ended no more than one month ago.
- OILI, the national enrollment service for the academic year maintained by the Finnish National Agency for Education
- Eduplan Ella, the registration system for studies at the Open University of Applied Sciences
- National cross-institutional study service channel (RIPA)
- SoleMove, the management system for international student mobility
- Wihi, the management system for thesis projects
- Student information from other educational programs transferred from personal data forms
- Information updated by teaching and guidance staff
- Information provided by the student themselves
- Learner number register maintained by the Finnish National Agency for Education
- Staff information updated with employment details from the financial management system

8. Regular disclosure of data

Regular data disclosures by Centria University of Applied Sciences are based on the authorities' right to access information as defined in various laws.

For the centralized storage and use of higher education institutions' student rights, enrollment, degree, and study performance data, there is a national data repository (VIRTA). This repository compiles the data content of registers containing student information from higher education institutions and provides this content through a secure technical interface for the use of the student selection register and joint student selection services of higher education institutions. The university can also use the data repository in its other activities and when disclosing information to authorities and other higher education institutions. (Act on National Study and Degree Registers 884/2017, Section 23§)

The information of Centria's students is primarily transferred through system integration from the Peppi study register and, for staff, from the financial and personnel management systems.

8.1. Disclosures of information from the VIRTA study information service for statutory authority needs

- Student admissions register (OPH)
- Koski service, national study credit, degree and qualification disclosure service, (OPH)
- Social Insurance Institution of Finland (KELA)
- Finnish Supervisory Agency
- Finnish Immigration Service (Migri)
- Student Health Foundation (YTHS)
- Service Centre for Continuing Learning and Employment (JOTPA)
- Finnish Centre for Pensions (Eläketurvakeskus)

8.2. Disclosures of information from the VIRTA study information service to authorities for data-driven management, research, and statistics

- Ministry of Education and Culture (OKM)
- Statistics Finland
- Vipunen, Education statistics Finland
- Statistics Finland's FIONA remote access service
- Finnish National Agency for Education

8.3. Services integrated with the VIRTA study information service

Services that use VIRTA data in the process of student enrollment, transfer of study records, or student feedback.

- ARVO service
Feedback questionnaire for University of Applied Sciences graduands (AVOP)
Career monitoring survey for graduates
Disclosure of the VIRTA data of individuals responding to the surveys.

- EMREX, Study Record Transfer Service
Transfer of data at the student's request
- Opin.fi, Higher Education Continuous Learning Course Offering
Disclosure of the logged-in learner's VIRTa data with the learner's consent

8.4. Disclosures of Virta data based on the learner's consent

- My Studyinfo
- MyData: [MyData partners](#)

8.5. Other Virta data disclosures

- University Admissions Finland consortium
to improve UAS student admissions
- Follow-up surveys
For research purposes, collecting information on studies and their progress, as well as the employment and career placement of graduates.

8.6. Additionally, Centria university of applied sciences processes, transfers, or discloses data as follows:

- User management system of Centria
- Itslearning
- ATOMI – Certification service
- VALO- Graduation service
- WIHI- Thesis project control and management system
- Fokus – Stydy monitoring service
- Tuudo Service (Tuudo Oy)
- National cross-institutional study service channel (RIPA)
- Learner number register (OPH)
For the purpose of obtaining the national learner ID and updating changed address information (from the Population Information System), the disclosure of data applies to students who have a valid study right or whose study right has ended no more than one month ago.
- PowerBI-Study monitoring service
- Opiferus-Opaasi, tuition fee management system
- The selected data can also be recorded to and saved in temporarily stored files
- Scientific research
- To fulfill the obligations of the Publicity Act or other legislation
- A student can grant permissions for the disclosure of their information
- Disclosure of staff information from Peppi: study guide, itslearning, VALO , course feedback, Wihi, RIPA, Fokus.

Reports and statistical data produced from the system for the planning, monitoring, and evaluation of the activities of the university of applied sciences 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.

As a rule, data from the VIRTa study information service is not disclosed outside the EU/EEA.

Data may be transferred outside the EU or EEA with the student's consent if the student is going on a study exchange.

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.

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. Rights of the data subject

The data subject has the following rights:

- the right to receive information about the processing of personal data
- the right of access
- the right to rectification
- the right to erasure (the right to be forgotten)
- the right to restriction of processing
- the right to object to processing
- the right to data portability
- the right not to be subject to automated decision-making

Data protection rights depend on the legal basis on which your personal data is processed. If the processing of your personal data is necessary or required by law, your personal data cannot be erased. You may withdraw your consent at any time, after which your personal data will no longer be processed unless there is another legal basis for the processing.

You can find more information about your rights here: [Data Protection - Centria](#)

You have the right to obtain a copy of your personal data free of charge. If a person requests multiple copies, the controller may charge a reasonable fee based on administrative costs (Article 15(3) of the EU General Data Protection Regulation).

You have the right to lodge a complaint with the supervisory authority if you believe that your personal data has not been processed appropriately. Contact details can be found on the website of the [Data Protection Ombudsman](#)