

**PRIVACY NOTICE**  
**Lut.fi online service**  
**EU's General Data Protection Regulation**  
**(2016/679),**  
**articles 13 and 14**  
**Date: 21 July 2021**  
**Updated: 29 February 2024**

**1. Data controller**

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**2. Data controller's representative and contacts**

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**3. Data protection officer**

Name: Legal Counsel Ilona Saarenpää  
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Email: [dataprotection@lut.fi](mailto:dataprotection@lut.fi)

#### **4. Purpose of data processing**

The purpose of the data processing is to maintain and develop the Lut.fi online service, improve its user experience and functionality and maintain and develop its content. The online service uses cookies to implement its functions and analyse visitor data. Also tags can be used for remarketing. Personal data can also be collected with forms with the express consent of the data subject for communication and marketing purposes.

#### **5. Legal basis of data processing**

Personal data will be processed only if it is relevant to the use of the online service or if it is based on the data subject's consent. The processing of personal data is based on a legitimate interest of the data controller to use visitor tracking, analysis and development, and if necessary, for targeted marketing. The data controller also has grounds for processing personal data if the data subject has given consent by filling in a separate form, for example, a newsletter subscription.

#### **6. Content of data file and storage periods**

The user's IP address, location information, browser device, browser application, browsing data and any other information provided by the user or collected on a separate form. The data storage period will be as long as necessary for the data controller's activities.

#### **7. Information system used**

Piwik Pro tools are used in online service visitor tracking to analyse the use of the website and its parts and for its development. Data collected with these tools will not be linked to personal data or other cookie data. Service providers used in providing the Lut.fi online service are granted access to the personal system data only to the extent specified in this privacy statement.

#### **8. Data sources**

Data is collected from the use of the online service and from the data subjects themselves. In addition, tags can be used for targeted marketing, such as social media pixels.

#### **9. Use of cookies**

The Lut.fi online service use cookies. A cookie is a small text file that the browser saves on the user's device. Cookies are used to ensure the implementation of services, service development, targeted marketing, and the compilation of statistics of services. Users may prevent the use of cookies, but this may prevent the online service from operating correctly.

#### **10. Data transfer and disclosure**

As a rule, data will not be disclosed beyond the organisation. External service providers used in providing the Lut.fi online service and supporting data processing are committed to observing the EU's data protection legislation.

Visitor tracking data can be transferred or used by Communications and Marketing only if the data subject has given his or her consent. External suppliers are committed to observing the EU's data protection legislation

## **11. Data transfer and disclosure beyond the EU and EEA**

Piwik Pro stores visitor tracking data on its servers in the EU. As a rule, personal data will not be transferred and disclosed beyond the EU or EEA. Service providers used in providing the Lut.fi online service may, in some cases, use servers beyond the EU or EEA, and therefore, data may be transferred. The service providers are committed to observing the EU's data protection legislation.

## **12. Safeguards for data processing**

User rights are granted only to employees whose job description requires access to the personal data file. The data is protected by observing the data protection regulations of the university. No printouts or other documents that require physical protection exist of the data.

## **13. Automated decision-making**

No automated decision-making takes place in the data processing.

## **14. Rights of the data subject**

Data subjects have the right to withdraw their consent if the data processing is based on consent.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if the subjects consider that the data processing regarding them is in breach of data processing legislation in force.

Data subjects have the following rights under the EU's General Data Protection Regulation:

- a) Right of access to data concerning the data subject (article 15)
- b) Right to rectification of data (article 16)
- c) Right to erasure of data (article 17). The right to erasure shall not apply if the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure prevents or significantly hinders the data processing.
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20).

Data subjects' rights under the EU's General Data Protection Regulation do not automatically apply to all data processing.

*The liaison in matters related to the data subject's rights is the data protection officer; contact details in section 3.*