

Description of the personal data file and data protection

This is LAPPEENRANNAN TANSSIOPISTO'S description of the personal data file and data protection in accordance with the Personal Data Act (523/1999, sections 10 and 24) and the EU General Data Protection Regulation (GDPR). Prepared on 3 May 2018. Last modified on 8 May 2020.

1. Controller

Lappeenrannan Tanssiopiston Kannatusyhdistys ry (Lappeenranta Dance Institute Support Association), Suvorovinkuja 3, FI-53900 Lappeenranta. Switchboard of the student office: +358 400 854 281
Email: toimisto@lprto.fi

2. Contact person responsible for the register

Kaija Kontunen-Forsblom, Rector of Lappeenrannan Tanssiopisto
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3. Name of the register

The personal data register and teaching register of the educational institution that contains the personal data of the students, parents/guardians, and employees.

4. Legal basis and purpose of personal data processing

The legal basis for personal data processing in accordance with the EU General Data Protection Regulation (GDPR) is the Act on Basic Education in the Arts (633/1998).

The register is maintained in the Eepos management service for educational institutions. Eepos is an ERP system designed for basic education in the arts, and is used for managing the personal data of students, parents/guardians, and teachers, and for organising teaching activities. Only the administrative personnel and teachers of the educational institution have access to the service.

The purpose of personal data processing is the organisation of teaching activities. The register is used for managing data that is necessary for organising teaching activities and that is generated in connection to these activities. Data concerning the teaching of students, teaching arrangements, and study results will be saved in the register.

Data is not used for automated decision-making or profiling.

The administration of the educational institution will process the study data of the students. The personal data of the students will only be processed, where required, to maintain the integrity of the register.

Teachers of the educational institution will only process the personal data of the students when the said data is essentially linked to their present teaching task. The teachers have no access to the exact personal or address data of the students or their parents/guardians.

5. Information contained in the register

The data saved in the register include: the name of the student, the date of birth and personal ID of the student, the contact details of the student (telephone number, email address, street address), the IP address of the network connection, invoicing data, the studies and study history of the student, completed studies and certificates, participation in classes, the name of the parent/guardian, the personal ID of the parent/guardian, the contact details of the parent/guardian (telephone number, email address, street address), the name of the teacher, the contact details of the teacher (telephone number, email address, street address), the teaching tasks of the teachers, organised classes, and statistics and student volumes related to teaching.

6. Regular sources of information

Data saved in the register are provided by the customer e.g. through online forms in connection to enrolment, by email, by telephone, at customer meetings, and in other situations in which the customer conveys personal data.

7. Regular disclosure of data and transfer of data outside the EU or the EEA

No data related to individuals is conveyed regularly to third parties. Statistics data related to teaching activities (the volume of students and teaching - without identifying data) is conveyed regularly e.g. to the Finnish National Board of Education and Statistics Finland. The Controller has the right to convey data to Visma Financial Solutions Oy's recovery service in connection to invoicing or debt recovery assignments. Visma Financial Solutions Oy is the controller of the recovery service and is responsible for all data protection obligations related to personal data. Personal data to be conveyed to Visma Financial Solutions Oy include the name, personal ID, telephone number, postal address, and email address of the customer, as well as data related to the recovery measures and the stages of the recovery process, and any other data that is relevant for managing the invoicing or recovery assignment.

Data can be published to the extent that has been agreed upon with the customer in advance.

Data will not be transferred outside the EU or EEA.

8. Storage period of personal data

The personal data of the student and their parent/guardian will be stored permanently. The data can be made anonymous subject to the data subject's request. The storage period enables the temporary interruption and restarting of studies without any student data history being erased. The storage time also enables a participation certificate to be awarded to the student once they have completed their studies.

9. Data security principles

Care will be exercised in handling the register, and the data processed in information systems will be appropriately protected. All sensitive personal data of the students, parents/guardians, and teachers will be stored strongly encrypted in databases and backup files. When data contained in the register is stored on Internet servers, the physical and digital security of the equipment is ensured in an appropriate manner. The Controller ensures that the stored data, server access rights, and other data that is critical for the security of the personal data are processed confidentially and only by persons whose work tasks include such processing. The information security of workstations is also ensured appropriately.

10. The rights of data subjects

The right to inspect personal data concerning oneself

Data subjects have the right to request a confirmation from the Controller on whether personal data concerning themselves is being processed and to inspect the personal data concerning themselves that is contained in the register. Data subjects also have the right to receive a copy of any personal data that is being processed. The inspection request must be sent to the Controller in accordance with section 2 and it must be submitted in writing and be signed. The inspection request can be refused based on grounds specified in the law.

The right to inspect personal data concerning oneself

The Controller will correct, remove, or supplement any personal data saved in the register that is erroneous, unnecessary, defective, or out-dated with regard to the purpose of processing either at its own initiative or subject to the request of the data subject (by contacting the Controller in accordance with section 2). Data subjects also have the right to request the Controller to restrict the processing of their personal data e.g. when the data subject is waiting for a response from the Controller to his or her request to correct or remove personal data.

The right to object to the processing of personal data

Data subjects have the right to object to the processing measures that the Controller takes concerning their personal data to the extent that the basis for such processing is the Controller's legitimate interest. Data subjects have the right to prohibit the processing and conveyance of personal data that concerns themselves for any other purpose than teaching activities by notifying the Controller of this in accordance with section 2.

The right to withdraw a given consent

If personal data is being processed based on a consent given by the data subject, the data subject has the right to withdraw his or her consent by notifying the Controller of this in accordance with section 2.

The right to transfer the data from one system to another

To the extent that the data subject has submitted (to the register) data that is being processed in order to implement a contract made between the Controller and the data subject, or based on a consent given by the data subject, the data subject has the right to receive such data in a structured, generally used, and machine-readable data format, and also has the right to transfer this data to another Controller (if technically possible).

The right to submit a claim to the supervisory authority

Data subjects have the right to submit a claim to the competent supervisory authority if the Controller has not complied with the data protection legislation applied to the Controller's activities.

11. Other rights related to the processing of personal data

Data subjects have the right to request that any information concerning themselves be removed from the register (the right to be forgotten). The data subjects also have all other rights specified in the GDPR, such as restricting the processing of personal data in certain situations. Requests must be submitted in writing to the Controller. Where required, the Controller has the right to ask the data subject to prove his or her identity. The Controller must react to any such requests made by the customer within the time period specified in the GDPR (in most cases, within one month).