

## **PRIVACY STATEMENT**

### **EU General Data Protection Regulation 2016/679**

#### **1. Controller of the register and contact information**

Controller: Aalto-yliopiston kauppateiden ylioppilaat ry ("Association")

Business ID: 22149760-2

Address: Konemiehentie 4, 02150 Espoo

Email: palvelu@ky.fi

Phone: +358 40 353 8283

Contact person: Joonna Huikuri, IT Coordinator

Email: joona.huikuri@ky.fi

Phone: +358 45 165 3838

#### **2. Name of the register**

Member register of Aalto University Business Students

#### **3. Data subjects**

This register includes personal data of current and former members, volunteers and contact persons of the Association ("Data subjects").

#### **4. Legal basis and purpose of gathering personal data**

The legal basis of gathering personal information is the maintenance of a member register as required by the Associations Act (503/1989) 11§ 1. subsection and in some cases fulfilling Association's co-operation agreements.

The purpose of the register is keeping the contact information of the members of the Association up to date during the membership within the personal data system ("System"), upkeeping the benefits and rights of the member and marketing.

#### **5. Data content**

The register contains Association's members personal data and contact information as well as other necessary information related to the membership. This includes following data:

- Data subject's first and last name;
- Data subject's address;
- Data subject's date of birth;
- Data subject's social security number;
- Data subject's email address;
- Data subject's phone number;
- Identification of digital communication;
- Data subject's student number;
- Data subject's starting year of studies;
- Data subject's stage of studies upon joining the Association;
- Data subject's positions of trust within the Association; and
- Information about grants and scholarships the data subject has applied for.

## **6. Regular sources of information**

Personal data is collected from the data subjects themselves upon joining the Association. Information about positions of trust are collected from the associations, committees and working groups that operate within the Association's environment and from the association register of Aalto University Business Students. Information about the data subject's stage of studies is received from Aalto University School of Business in order to accept and end memberships.

## **7. Regular disclosures and transfers of personal data**

Personal data is regularly disclosed to (1) the Foundation for Business Students in Aalto University when data subjects apply for grants and scholarships, and to (2) Finnish Business School Graduates, as all Association's student members are its members.

Personal data can be disclosed to Association's cooperation partners in order to carry out services related to the membership. Personal data can be disclosed to Association's cooperation partners in order to carry out services that are not related to the membership only with the data subject's consent.

Personal data can be transferred to other service providers in order to execute the System. The service provider executing the technical maintenance of the member register may transfer personal data in accordance with applicable privacy legislation and this privacy statement.

## **8. Transfers of personal data outside of EU or the EEA**

Personal data won't be transferred outside the European Union or the European Economic Area by the Association. However, the Association may use a service provider that is located outside of the EU or the EEA. The transfer of personal data outside of EU or the EEA is always carried out on one of the following legal grounds:

- The European Commission has decided that an adequate level of data protection has been ensured in the recipient country;
- The Association has implemented the appropriate safeguards for the transfer of personal data using standard terms of privacy approved by the European Commission. The data subject has the right to obtain a copy of these standard clauses by contacting the Association's contact person; or
- The data subject has consented to the transfer of their personal data, or there is a lawful ground for the transfer.

Access to the personal data is limited to what is necessary in order to carry out the services. The transfer of personal data outside of the EU or the EEA is always based on current legislation on the processing of personal data and is carried out in accordance with that legislation.

## **9. Protection of personal data and information security**

All digitally handled personal data is stored securely in the Association's System. Access to the System is limited to only authorized individuals that need the access in order to handle their work assignments. These individuals use their personal usernames and passwords to access the System.

Personal data is secured from outsiders and the use of member data is supervised. Personal data sent outside the Association is encrypted. Workstations and storages are secured.

Lime Technologies Finland Oy (2320811-1) is responsible for the technical maintenance and protection of the member register.

Possible print documents are protected by storing them in a locked space preventing access from third parties.

## **10. Retention period of data**

Personal data is stored in the register for as long as the data subject is a member of the Association or the retention is justified by executing benefits and rights related to the Association.

Personal data will be retained for a maximum of 10 years after the membership has ended on the basis of the Association's legitimate interest. Personal data may be stored for longer time periods if the applicable legislation or Association's contractual obligations require it.

## **11. Data subject's rights**

The data subject has the right to object to the processing of his/hers personal data for direct marketing purposes at any given time. The data subject may provide the Association with channel-specific consents and restrictions (e.g. prohibit marketing via email).

In addition the data subject has per se following rights at any time in accordance with applicable data protection legislation:

- receive information about the processing of his/hers personal data;
- have access to his/hers own personal data and inspect his/hers personal data processed by the Association;
- demand correction and supplementation of inaccurate or incorrect personal data;
- demand the removal of own personal data;
- withdraw his/hers consent and object to the processing of personal data insofar as the processing of personal data is based on consent;
- receive his/hers personal data in digital form and transfer those to another service provider given that the data subject has delivered the data to the Association personally, the Association processes the personal data in question based on consent and the processing is automatic; and
- demand the processing of his/hers personal data to be restricted.

The data subject must submit the request for execution of the above-mentioned according to section 13 of this privacy statement. The Association may ask the data subject to specify the request in writing and verify the data subject's identity before processing the request. The Association may refuse to execute the request based on applicable legislation.

## **12. Right to complain to supervising authority**

Each data subject has the right to complain to the relevant supervising authorities or to the supervisory authorities of the Member State of the European Union where the data subject's resident or workplace is located if the data subject sees that his/hers personal data has not been processed according to applicable data protection legislation.

## **13. Contact information**

Requests considering the data subject's rights, questions about this privacy statement and other contacts should be sent via email to the contact person.

Contact person: Joonna Huikuri, IT Coordinator  
Email: joona.huikuri@ky.fi

The data subject may also contact us personally or in writing at the address below:

Aalto-yliopiston kauppateiden ylioppilaat ry  
Konemiehentie 4  
02150 Espoo

#### **14. Changes to this privacy statement**

This privacy statement has been accepted by the Executive Board of the Association in its meeting on 4.3.2021. This privacy statement can be updated from time to time, for example, when legislation changes. This privacy statement was last updated 4.3.2021.