



1. Data controller	Name: Lapin yliopiston ylioppilaskunta, LYY The Student Union of The University of Lapland  Address: Ahkiomaantie 23 B, 96300 Rovaniemi
2. Person responsible for the register	Service and Administration Specialistvs. Joel Liukkonen hallinto@lyy.fi 050 544 9044
3. Name of the register	Lapin yliopiston ylioppilaskunnan hyvinvointirekisteri (LYY's Wellness Register)
4. Purpose of the processing of personal data and the legal basis for the processing	<p>The legal bases for the processing of personal data are the following, in accordance with the General Data Protection Regulation (hereinafter "GDPR"):</p> <ol style="list-style-type: none"><li>1. The data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 1.a of the GDPR);</li><li>2. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 (1b) of the GDPR);</li><li>3. Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6 1.f of the GDPR).</li></ol> <p>The controller's legitimate interest referred to above is based on a relevant and appropriate relationship between the data subject and the controller, where the data subject is a client of the controller, and the data subject can reasonably expect at the time and in the context of the collection of the personal data that processing for that purpose takes place.</p> <p>Universities Act (558/2009) Section 46 states that all university students who have been admitted to programmes leading to a Bachelor's or Master's degree, with the exception of students in commissioned education, belong to the student union. The student union may also accept other students of the university as members.</p> <p>Section 39 states that students who have been admitted and who have accepted a student place must enroll at the university in the manner specified by the university, whereupon they are enrolled as a student. As the student enrolls at the university and pays the membership fee for the LYY, a student may also purchase the LYY's Wellness Pass. Acquiring the Wellness Pass requires the student to join the Lapin yliopiston ylioppilaskunnan hyvinvointirekisteri (LYY's Wellness Register). LYY collects personal data for authentication, for informing the clients and for the implementation of the electronic Wellness Pass and for promoting lifelong learning (Section 2, Universities Act (558/2009)) and for duties of the student union.</p> <p>The information is not used for direct marketing, automated decision making or person profiling.</p>

5. Categories of personal data and information content	<ul style="list-style-type: none"> <li>- LYY collects only such personal data that is relevant and necessary for the purposes described in this privacy statement: name and email address.</li> </ul>
6. Sources of personal data.	<p>The University of Lapland provides information on the purchase of a Wellness Pass to the Student Union through the Student Administration Register Oili. Pass purchasers disclose information about themselves. A separate agreement regarding the disclosure of information is made between the University of Lapland and LYY.</p>
7. Transfer of personal data outside the European Union or the European Economic Area	<p>With the express and individual consent of the member, personal data may be disclosed to third parties in order to manage the use of the Wellness Pass, for example to the operator responsible for the electronic implementation of the Pass, Kide.app. Registration information will only be disclosed if it is justified and necessary for the operation of the Pass.</p> <p>As a rule, the data are not disclosed outside EU or EEA countries. The data will not be stored outside the EU or EEA.</p>
8. Data protection principles and security of processing	<ul style="list-style-type: none"> <li>- 1. Data processing</li> <li>- - Personal data is processed in a manner that ensures the appropriate security of the personal data</li> <li>- - The processing of data is carried out with due diligence and legality and reasonableness</li> <li>- in accordance with Chapter II, Article 5 of the General EU Data Protection Regulation (EU 2016/679) and is processed in a transparent way for the data subject;</li> <li>- - The data will be collected only for the purposes specified in point 4 of this privacy statement and will not be further processed in a way incompatible with those purposes;</li> <li>- - Personal data are processed mainly to fulfill legal obligations</li> <li>- - The information is treated confidentially and only by the employees of the student union whose duties require the processing of the information;</li> <li>- - Personal data may, however, be processed for other purposes with the unambiguous and explicit consent of the data subject;</li> <li>- 2. Data protection</li> <li>- - The access to study administration register Oili and the Wellness Pass information is only available to those who have received a system user ID.</li> <li>- - In the student union, only the Secretary General, the Advocacy Specialist and the</li> </ul>



	<ul style="list-style-type: none"> <li>- Organization and Communication Specialist have user IDs</li> <li>- - Usernames and passwords are issued by Oili's administrator on the basis of an application from a student union employee</li> <li>- - The system user IDs are valid for a specified period</li> <li>- - The workstations of the said workers are protected and used only by that worker</li> <li>- - Logging in to the workstation requires a password each time you log in</li> <li>- - The study administration register Oili requires a login, and a password is entered each time you log in.</li> <li>- - Student union employees only log into Oili at workstations owned by the student union</li> <li>- - The connection between the registry and the workstations are protected from access by third parties</li> <li>- - Access to the data is limited to viewing the data for the purpose required by the employee's duties for the purpose of maintaining the wellness register;</li> <li>- - Student union staff cannot edit information in the Student Administration Register Oili</li> <li>- 3. Accuracy and retention of information</li> <li>- - The processed personal data are accurate</li> <li>- - In the event of a change in personal data, the Student Union instructs the member of the register to update their personal data and delete the incorrect data</li> </ul>
<p>9. Rights of data subjects</p>	<p>A member of the register has the right to check the information about themselves contained in the register. A request to exercise the right of review must be made in person or by hand with a signed letter to the Study Services of the University of Lapland or to the Student Union of the University of Lapland. The request shall be made on an individual basis and should clarify what information is required to be corrected and how the correction is requested.</p>
<p>10. Other rights</p>	<p>The University of Lapland's student services is responsible for updating the register. The University of Lapland's student services is responsible for the data subject's right to have the data controller delete personal data concerning the data subject.</p> <p>The Student Union of the University of Lapland processes personal data only for the purposes of the Wellness Pass, and only for as long as the person is entitled to use the passport. With the unambiguous and explicit consent of a member of the register, personal data may also be processed for other purposes.</p>