

In accordance with the EU's General Data Protection Regulation (2016/679).
 Approved by the GDPR implementation project on 6 February 2018.
 Privacy notice updated 13 August 2019.

Privacy notice City of Espoo

1. Register name	Pupil register for Finnish-language basic education
2. Controller	City of Espoo P.O. Box 1, 02070 CITY OF ESPOO
3. Person responsible for the register	Juha Nurmi, development manager
	juha.nurmi(at)espoo.fi P.O. Box 31, 02070 CITY OF ESPOO tel. +358 (0)50 372 5852
4. Contact person for the register	Principals/school directors are responsible for tasks related to the register as regards the schools that they manage. The data subject can contact a principal/school director to receive more detailed information about the register or their own rights.
5. Data Protection Officer appointed by the organisation	Juho Nurmi, data protection officer
	P.O. Box 12, 02070 CITY OF ESPOO tel. +358 (0)43-827 3077 tietosuoja@espoo.fi
6. Purposes of processing personal data and the legal basis for processing	<p>Legal basis for processing</p> <ul style="list-style-type: none"> - Organisation of basic education <ul style="list-style-type: none"> o Article 6, paragraph 1, point c of the EU's General Data Protection Regulation (processing is necessary for compliance with a legal obligation) o Basic Education Act 628/1998 <p>Purposes of processing</p> <ul style="list-style-type: none"> - Organisation of teaching and taking care of tasks that arise from the education provider's relationship with the pupil. - The register is used for compiling statistics for the City of Espoo. When statistics are compiled, the data are processed anonymously. - Disclosure of statutory pupil numbers of schools for Government data collection purposes.

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Processing methods

The Finnish Education Unit uses the following City-level systems and electronic environments in which pupils' and potentially guardians' personal data are processed:

- school administration system Primus and Kurre (includes Wilma, which is the browser-based user interface of Primus and Kurre)
- work environment Google G Suite for Education
- work environment Microsoft O365 (includes Skype, OneDrive, Teams, amongst others)
- mobile device management Apple School Manager/Lightspeed.

The purposes for which personal data related to the organisation of teaching is processed in the aforementioned systems and environments are specified in greater detail below.

The City of Espoo's employees and school pupils operate in the same Microsoft O365 work environment. The pupil's name, e-mail address, pupil number and school are visible to users of the environment when using the search function in Skype or OneDrive, for example. The City's entire personnel has accepted a data protection commitment. Access rights are personal and password-protected.

Personal data may also be processed in school-specific applications used in teaching. The data subject can contact a principal/school director to receive more detailed information about the register or their own rights.

For the purpose of organising basic education, personal data may also need to be processed outside of the aforementioned systems/environments, e.g. to support assessments conducted by teachers, prepare school transportation decisions, organise school lunch (special diets) or organise school trips or camps.

For what purposes are personal data processed in systems and electronic environments?**Primus, Kurre and Wilma****Primus and Kurre**

- o Organisation of basic education and monitoring the completion of compulsory schooling (Sections 4 and 26 of the Basic Education Act).
- o Taking care of tasks that arise from the education provider's relationship with the pupil.

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	<ul style="list-style-type: none"> ○ Provision of three-tier support in accordance with Sections 16–17a of the Basic Education Act. ○ Organisation of school transportation. ○ Creation of a user identity for the study environment's electronic services (Microsoft O365, Google G Suite for Education). ○ Provision of a mobile device management service (AppleID/Lightspeed). ○ Administration of user accounts for the Wilma user interface. ○ School-specific statutory pupil number data are disclosed for Government data collection purposes based on data in Primus. (Act on the Financing of Educational and Cultural Provision, Act on Central Government Transfers to Local Government for Basic Public Services). ○ Data in Primus is used to compile statistics for the City of Espoo. When statistics are compiled, the personal data are processed anonymously. ○ Pupils' subject and course selection data are stored in Kurre's work plan software for the purpose of preparing work plans <p>Wilma (browser-based interface of the Primus and Kurre school administration system)</p> <p>Wilma can be used to carry out:</p> <ul style="list-style-type: none"> - absence recording - pupil assessment - registration of new pupils - course selection and course registration - cooperation between schools and homes - communications (communication with and notifications to guardians and guardians' messages to schools) - surveys and their feedback - notices concerning pupils relating to their school performance (steering/corrective feedback, follow-up feedback, positive feedback) - upper stage comprehensive school selections and related information - communication of decisions related the school place, if the pupil's guardian has provided their consent for this. <p>Microsoft O365</p> <ul style="list-style-type: none"> - organisation of basic education (O365 includes electronic tools and user-produced content) - management of O365 access rights
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	<ul style="list-style-type: none"> - enabling of interaction between users within their own groups - use of e-mail services. <p>Google G Suite for Education (GSuite)</p> <ul style="list-style-type: none"> - organisation of basic education (GSuite includes electronic tools and user-produced content) - management of GSuite access rights - enabling of interaction between users within their own groups - management of devices connected to the service and the software and applications used on them (e.g. Chrome, Classroom and Drive). <p>Mobile device management (Apple School Manager/Lightspeed)</p> <p>The mobile device management service is used for the data-secure management of the mobile devices used in schools, to improve the privacy of users of shared tablets in particular with the help of Apple ID. Administered Apple ID accounts are created and shared by the educational institution. Since the educational institution retains administration rights, Apple ID provides pupils with controlled access to iCloud, iTunes U. This makes it possible to ensure that pupils use the devices they obtain from the school only for learning purposes, for example. Since the administered Apple IDs are created and shared by the educational institution, passwords can be easily reset, accounts can be reviewed and the roles of everyone associated with the school can be defined by an administrator, if necessary. Administrators' actions are logged.</p> <p>The mobile device management service consists of two components: 1) a management solution (Apple School Manager), and 2) a remote management environment (Lightspeed).</p> <p>The remote management environment creates the correct school and group structure for the management solution. The management solutions can be used not only to create accounts, but also to purchase content, define the automatic registration of devices in the remote management environment and to prepare iTunes U courses, for example.</p>
<p>7. Data content of the register</p>	<p>Data content of the systems and electronic environments</p> <p>Primus, Kurre and Wilma</p> <ul style="list-style-type: none"> • the pupil's name, personal identity code, contact information and photograph

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	<ul style="list-style-type: none"> • the pupil's AD account for the Wilma user interface and pupil network • the pupil's guardians' name and contact information and Wilma user account • information concerning the pupil's role (comprehensives school pupil, home-school pupil; subject student; hospital teaching) • information on selections concerning subjects and syllabuses • the pupil's assessment information • decisions concerning the pupil • the pupil's school history • the pupil's immigration-related information • information related to school transportation • information concerning the pupil's absences • other information related to teaching the organisation of teaching (e.g. Finnish as a second language teaching, special support; language programme; language immersion and bilingual teaching; religion and ethics subjects) • the pupil's participation in afternoon activities, the service provider and operating time (full-time/part time) • pedagogic documents: pedagogic assessment, pedagogic report, learning plan, individual education plan (IEP), support measures. <p>Special categories of personal data processed include information on religious or philosophical conviction and possibly information related to health</p> <p>Microsoft O365</p> <ul style="list-style-type: none"> • the user's name • information related to schooling (grade, group, etc.) • encrypted unique identifier • e-mail address • account name • password • information produced or added by the pupil themselves. <p>Content produced by the pupil and guardian themselves means pictures, texts, links, videos and audio files uploaded to the system.</p> <p>The user can, for example, add their own description of themselves and their area of responsibility, their mobile phone number, location information, competence information, date of birth and other areas of interest to the service, to be viewed by everyone/limited users. The user can allow the utilisation of the information content that they produce and obtain information about their networking and closest friends.</p>
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	<p>Google G Suite for Education</p> <ul style="list-style-type: none"> • the pupil's name • user account • school • grade and groups • encrypted unique identifier • information produced or added by the user themselves. <p>An administrator can save information such organisations' names, websites, phone numbers, addresses and account suspension in the service. In addition to this, Google collects information from end users, the entering of which is based on information entered by the user themselves, e.g.: phone number, a photograph of the user, date of birth, the user's device-specific information, such as hardware model, operating system version, individual device identified and mobile network used, including mobile phone number. Google can connect the device identifier or phone number to a Google account.</p> <p>Mobile device management <i>AppleID/Lightspeed</i></p> <ul style="list-style-type: none"> • Pupil person_id,"person_number","first_name","middle_name", "last_name", "grade_level","email_address","sis_username","password_policy", "location_id" <p>The following variables are not currently used: middle_name, grade level</p> <ul style="list-style-type: none"> • Classes course_id,"course_number","course_name","location_id" • Groups class_id,"class_number","course_id","instructor_id","instructor_id_2", "instructor_id_3","location_id" <p>In practice, all ID information is running alphanumeric series.</p> <p>Personal data processed outside of the systems and electronic environments</p> <p>These personal data may include, for example, the pupil's identifying and contact information, information related to assessment and information related to health (relating to school transportation and school lunches, for example)</p>
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<p>8. Sources of personal data</p>	<ul style="list-style-type: none"> • The basic information of pupils starting basic education is transferred to the Primus and Kurre school administration system from the Xcity population information system maintained by the City of Espoo. After this, pupils' and their guardians' basic information is updated into the Primus school administration system from XCity every two weeks. • Guardians supplement and update personal data using a pupil registration form or in Wilma. • The majority of the information saved in the register consists of information related to the pupil's education, created in the organisation of education. <p><i>Changing schools</i></p> <ul style="list-style-type: none"> • A pupil's previous school may disclose to their new school public information necessary to the new school for arranging instruction for the pupil (Section 16(3) of the Act on the Openness of Government Activities). • If the pupil has previously studied at another comprehensive school in the same municipality, the previous school may transfer information necessary for arranging instruction for the pupil to the new comprehensive school, even if said information is confidential (Section 40(2) of the Basic Education Act). • Notwithstanding provisions on confidentiality, if a pupil under the age of 18 transfers to education or activities organised by another education provider in accordance with the Basic Education Act, the former education provider must without delay provide information necessary for arranging instruction for the pupil to the new education provider. The information may also be provided at the request of the new education provider (Section 40(4) of the Basic Education Act). <p><i>Pedagogic documents</i></p> <p>Pedagogic documents are prepared with the help of the Wilma interface as part of multidisciplinary cooperation in accordance with the Basic Education Act. The person responsible for pedagogic documents is the class supervisor or class teacher.</p> <p><i>Electronic study environment services</i></p> <p>Electronic study environment services are produced with the user identity of Visma's Primus school administration system (name, encrypted unique identifier, school, class, grade, teaching groups, e-mail address, user name).</p> <p>In Microsoft's O365 service, user identity is administered by Microsoft's Azure AD, which is the City's centralised user authorisation management and log register, Microsoft AD and Azure AD.</p> <p>In mobile device management, a user identity is imported into the management solution (Apple School Manager), e.g. for the creation of an</p>
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	<p>AppleID. The remote management environment Lightspeed synchronises user identities (user information, class information and teachers) from the management solution to create the correct school and group structure for it.</p>
<p>9. Recipients and recipient groups of personal data</p>	<p><i>Koski</i></p> <ul style="list-style-type: none"> The national centralised integration service for study rights and study records (KOSKI) collects students' study records and study rights in a single service. The information is collected directly from the pupil register. (Act on the National Registers of Education Records, Qualifications and Degrees 884/2017) <p><i>Changing schools or transferring to a general upper secondary school or vocational education and training</i></p> <ul style="list-style-type: none"> If the pupil transfers to another comprehensive school, the school may transfer public information necessary for arranging instruction for the pupil to the new school (Section 16(3) of the Act on the Openness of Government Activities). If the pupil transfers to another comprehensive school within the same municipality, confidential information may be transferred to the new school if it is necessary for the appropriate arrangement of instruction for the pupil (Section 40(2) of the Basic Education Act). Notwithstanding provisions on confidentiality, if a pupil under the age of 18 transfers to education, activities or training organised by another education provider in accordance with the Basic Education Act, the Act on General Upper Secondary Education, the Act on Vocational Education and Training or the Act on Vocational Adult Education and Training, the former education provider must without delay forward information necessary for arranging instruction or training for the pupil to the new education provider. The information may also be provided at the request of the new education provider (Section 40(4) of the Basic Education Act). <p><i>Outreach youth work</i></p> <ul style="list-style-type: none"> An education provider shall disclose the identifying information and contact details of a young person who has completed his or her basic education but who is not pursuing any studies beyond the completed basic education to the young person's home municipality for outreach youth work purposes (Section 11(2)(1) of the Youth Act). <p><i>Transfer of data to service providers</i></p> <p>The service providers used in the organisation of education (such as the providers of electronic environments) process students' personal data to the extent necessary for the provision of the service. The City of Espoo is always the controller of the data.</p>

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Microsoft's subcontractors

- List of subcontractors used by Microsoft:
<https://go.microsoft.com/fwlink/p/?linkid=2096306>

Google's subcontractors

- List of subcontractors used by Google G Suite:
<https://gsuite.google.com/intl/en/terms/subprocessors.html>

Transfer of data to other systems

- transfer of pupils' address information to the Reitti-GIS geographic information application for the purpose of processing pupil placement and school transportation
- transfer of pupils' data to the Finnish National Agency for Education's Studyinfo
- data specified in the Statistics Act to Statistics Finland.

Based on the specific written consent of the data subject/underage pupil's guardian, data may also be transferred to other parties. Data may be disclosed if there is a specific provision on such access or on the right of such access in an Act. (Section 26 of the Act on the Openness of Government Activities).

The disclosure of public information from a personal data filing system controlled by an authority is based on Section 16(3) of the Act on the Openness of Government Activities. According to this provision, the party requesting access must have the right to record and use such data. Personal data may only be disclosed on the basis of a sufficiently detailed request for access. (Section 13(2) of the Act on the Openness of Government Activities)

Pedagogic documents

- The documents contain confidential information.
- If the pupil transfers to another comprehensive school within the same municipality, confidential information may only be transferred to the new school if it is necessary for the appropriate arrangement of instruction for the pupil (Section 40(2) of the Basic Education Act).
- Notwithstanding provisions on confidentiality, if a pupil under the age of 18 transfers to education, activities or training organised by another education provider in accordance with the Basic Education Act, the Act on General Upper Secondary Education, the Act on Vocational Education and Training or the Act on Vocational Adult Education and Training, the former education provider must without delay forward information necessary for arranging instruction or training for the pupil to the new education provider.
The information may also be provided at the request of the new education provider (Section 40(4) of the Basic Education Act).
- Those participating in pupil welfare work have the right to obtain from one another and disclose to one another and to the pupil's teacher, principal and the authority responsible for education operations under the Basic Education Act information necessary for the appropriate arrangement of instruction for the pupil (Section 40(2) of the Basic Education Act).

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	<p>Based on Section 21 of the Basic Education Act, personal data may be disclosed for the purpose of organising external education evaluation (such as a PISA or TIMSS survey or an evaluation by the Finnish Education Evaluation Centre). The personal data disclosed for this purpose include only the data necessary for organising the evaluation. Individual pupils are not evaluated.</p>
<p>10. Transfer of data outside the EU or the EEA</p>	<p>Primus, Kurre and Wilma</p> <ul style="list-style-type: none"> • Data are not transferred outside the EU or the EEA. <p>Electronic study environment services</p> <ul style="list-style-type: none"> • Microsoft O365 Personal data are transferred outside the European Union or the European Economic Area (Microsoft Online). Basis for transfer: The terms of Microsoft Online services, including standard contractual clauses approved by the European Commission (Attachment 3), are available on Microsoft's website: https://www.microsoftvolumelicensing.com/Downloader.aspx?Documenttype=OST&lang=English. • Google G Suite for Education Personal data are transferred outside the EU or the EEA. Basis for transfer: Standard contractual clauses approved by the European Commission: https://gsuite.google.com/terms/mcc_terms.html and Google's amendment: https://gsuite.google.com/terms/dpa_terms.html. <p>Mobile device management</p> <ul style="list-style-type: none"> • Apple School Manager Personal data are transferred outside the EU or the EEA. Basis for transfer: The terms of Apple's services, including standard contractual clauses approved by the European Commission (starting from page 17), are available on Apple's website: http://images.apple.com/legal/education/apple-school-manager/ASM-FI-EN.pdf • Lightspeed

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	<p>Personal data are transferred outside the EU or the EEA. Basis for transfer: Lightspeed's privacy policy: section 6) European Union Data Protection: https://www.lightspeedsystems.com/privacy</p>
<p>11. Data storage periods</p>	<p>Data are stored and destroyed in line with the records management plan of the Finnish Education Unit. Personal data are stored in the pupil register for one (1) year from the end of the use of the service. Statutory obligations regarding the storage of data are taken into account in the deletion of the data. The information and documents in electronic environments are stored in archived in the online services in accordance with the Finnish Education Unit's records management plan for one year after the end of compulsory education.</p>
<p>12. Register maintenance systems and principles of protection</p>	<p>Personal data are processed in a manner that ensures appropriate security of the personal data (Article 5, paragraph 1, point f of the GDPR). The processing of personal data is regulated by the principles of purpose limitation, necessity and accuracy, amongst others. Each employee can only process the data they need to conduct their work.</p> <p>The protection of confidential and sensitive data are given particular consideration in the likes of the descriptions of work processes and the granting of access rights. Provisions on the confidentiality of data are laid down in Section 40 of the Basic Education Act and Section 24 of the Act on the Openness of Government Activities.</p> <p>Electronic maintenance systems: The Primus and Kurre school administration system can only be accessed through the administration network. The administration network is a protected internal domain that is only accessible to employees of the City of Espoo. All users of the network accept an access rights commitment, which includes a non-disclosure commitment, amongst other provisions. The server hardware is located in a protected, supervised space in the service provider's data centre. Electronically processed data are transmitted encrypted on the open Internet. The data in the register are backed up automatically at regular intervals.</p> <p>Personal data are protected with access rights determined based on the duties of school and unit employees. Access rights are restricted in accordance with duties and are based on user roles, which have access to duty-specific screens and functions. Read, write, save and delete rights are defined separately for each access rights group.</p> <p>Manual materials: Manual materials are stored in locked work premises and locked cabinets.</p>

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<p>13. Informing the data subjects</p>	<p>This privacy statement has been prepared for client information purposes.</p> <p>The privacy statement is available from the Finnish Education Unit and on the City of Espoo's website: https://www.espoo.fi/en-US/Eservices/Data_protection/Privacy_Notices</p>
<p>14. Right of access to data</p>	<p>The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs.</p> <p>The controller must provide the information without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.</p> <p>If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.</p> <p>Information provided under Articles 13 and 14 and any communication and any actions taken under Articles 15–22 and 34 of the EU's General Data Protection Regulation shall be provided free of charge.</p> <p>Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either</p> <ol style="list-style-type: none"> a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or b) refuse to act on the request. The controller shall bear the burden of demonstrating the manifestly unfounded or excessive character of the request. <p>How to submit a request for access:</p>

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	<ul style="list-style-type: none"> • Send it by post to the contact persons mentioned in the privacy statement. • Bring it to a service point or the Registry Office, where your identity will be verified. <p>Link: Request for access form (in Finnish)</p>
<p>15. Right to rectification</p>	<p>The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.</p> <p>The data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Whether or not the data are incomplete is determined taking into account the purposes of the processing of the personal data in the register.</p> <p>If the controller does not accept the data subject's demand for rectification, the controller must provide a written statement to that effect. The statement must also mention the reasons why the demand was not accepted and inform the data subject of the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.</p> <p>How to submit a request for rectification:</p> <ul style="list-style-type: none"> • Send it by post to the contact persons mentioned in the privacy statement. • Bring it to a service point or the Registry Office, where your identity will be verified. <p>Link: Request for rectification form (in Finnish)</p>

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<p>16. Right to lodge a complaint</p>	<p>Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with the Office of the Data Protection Ombudsman, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation. This right is laid down in Article 77 of the General Data Protection Regulation (GDPR, 2016/679).</p>
<p>17. Other potential rights</p>	<p>Requests should be made to the contact person of the register.</p> <p>Right to erasure (Article 17 of the GDPR)</p> <p>The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay where one of the grounds laid down in Article 17(1) applies. The data subject does not have the right to erasure for example if the processing of data is necessary for compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> <p>Right to restriction of processing (Article 18 of the GDPR)</p> <p>The data subject shall have the right to obtain from the controller restriction of processing where one of the requirements laid down in Article 18(1)(a–d) applies.</p> <p>Right to object (Article 21 of the GDPR)</p> <p>The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, which is processed for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing.</p> <p>Right to data portability (Article 20 of the GDPR)</p> <p>The data subject shall have the right to have his or her data transmitted only if the processing of data is based on consent or on a contract, and if the processing is carried out by automated means. The data subject's right to data portability does not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> <p>If the processing of data is based on consent, the data subject shall have the right to withdraw his or her consent at any time.</p>