



Customers/stakeholder representatives of KAMK Oy,

This data protection notice sets out the purposes for collecting your personal data and how they are processed.

<b>Data files controller</b>	<b>Name:</b> Kajaanin Ammattikorkeakoulu Oy	
	<b>Address:</b> PL 52, 87101 Kajaani	
	<b>Other contact information (e.g. Telephone during working hours, email address):</b> (08) 618 991, kajaanin.amk@kamk.fi	
<b>Contact person for the data files controller</b>	<b>Name:</b> Director for RDI Mikko Keränen	
	<b>Address:</b> PL 52, 87101 Kajaani	
	<b>Telephone:</b> 044 7101 620	<b>Email:</b> mikko.keranen@kamk.fi
<b>Data Protection Officer</b>	<b>Name:</b> Tietosuojavastaava KAMK Oy	
	<b>Address:</b> PL 52, 87101 Kajaani	
	<b>Email:</b> tietosuojavastaava@kamk.fi	
<b>Name of data file</b>	Customer and stakeholder file of KAMK Oy	
<b>Purpose of personal data processing</b>	<p>Personal data is collected and processed for the following purposes:</p> <ul style="list-style-type: none"><li>• customer and stakeholder relationship management and other customer communications such as marketing, newsletters, customer surveys, customer contact maintenance and invoicing</li><li>• the provision of expert and customer services related to the services and assignments of the controller</li><li>• contacting potential customers</li><li>• teaching co-operation in working life and the implementation of research, development and innovation activities, such as the implementation of co-operation projects</li></ul> <p>planning and developing the controller's operations and offerings</p> <ul style="list-style-type: none"><li>• the execution and management of services (e.g. events and training) and assignments, including the processing of service requests, communication with clients, potential raffles, the sharing of lists of participants in training session and the management of access rights in the controller's information systems;</li><li>• stakeholder cooperation, such as maintaining the areas of expertise (KAMK Schools) of acting lecturers and registering implementations, and paying stakeholder invoices and fees</li><li>• surrendering the contact information of participants in an event/training to other stakeholders involved in the event for marketing purposes</li><li>• for access control and video surveillance purposes</li></ul>	



	<p>The processing of personal data is primarily based on the legitimate interests of the controller (e.g. customer relationship management, to guarantee legal protection, marketing, invoicing, payment of fees, distributing event participant lists, surrendering data to stakeholders for marketing purposes) or on agreement (e.g. enrolment in training) or on legal obligations (e.g. bookkeeping obligations in relation to storing invoicing data. In addition, consent may be sought from the data subjects as necessary (e.g. raffles).</p> <p>In cases of co-operation related to teaching and research, development and innovation, the processing of data is based on the statutory tasks of the University of Applied Sciences (University of Applied Sciences Act 932/2014).</p> <p>Special remarks concerning training and events organized by the controller: Data surrendered for enrolment purposes can be used to organize the event in question and the names of the enrolled can be shared in the list of participants. The event may be recorded on video. The purpose of filming is to enable participation in training remotely or the use of recordings/images for educational or marketing purposes.</p> <p>KAMK may also use external processors of personal data, such as companies providing system services, which process personal data on behalf of KAMK on a contractual basis.</p>
<b>Data file content</b>	<p>The customer/stakeholder file retains and update the following data:</p> <ul style="list-style-type: none"><li>• contact information of persons who have used KAMK's services and the organizations they represent</li><li>• contact information for KAMK's contract customers and the persons acting as their representatives</li><li>• contact information of potential customers</li><li>• contact details of persons who have otherwise given their marketing consent and the organizations they represent</li><li>• contact details of stakeholders</li><li>• information on the events and measures concerning the implementation of KAMK's above-mentioned tasks and customer/stakeholder relationship management.</li></ul> <p>The following information concerning the data subject can be retained:</p> <ul style="list-style-type: none"><li>• name of customer/stakeholder organisation</li><li>• name of person(s) representing the customer/stakeholder organisation</li><li>• professional title</li><li>• contact information (address, telephone, email, other possible contact details)</li><li>• invoicing information</li><li>• information concerning services ordered by the customer</li><li>• state of customer relations</li><li>• information concerning the qualifications and competence of external experts</li><li>• student group code, academic year, year of graduation, degree</li><li>• order history</li></ul>



	<ul style="list-style-type: none"> <li>• access monitoring and video surveillance data if the data subject has visited our facilities</li> <li>• IT administration data such as technical ID, logged data, user names, technical data related to services offered</li> </ul> <p>It may be possible to identify people recorded in training videos/broadcasts or images.</p> <p>Data for marketing purposes may be used for as long as the controller needs the information for that purpose. For accounting purposes, data will be retained for as long as required by law.</p> <p>Service requests related to service activities are retained for 10 years from the end of the calendar year in which the service request has been resolved.</p> <p>Personal data stored on potential customers will be deleted if no customer relationship or stakeholder cooperation occurs.</p>
<b>Authorised sources of information</b>	<p>Data is primarily obtained from the data subject.</p> <ul style="list-style-type: none"> <li>• Data can be collected and supplemented using e.g.</li> <li>• publicly available sources (e.g. the internet),</li> <li>• the Vainu data service (based on contract, the data is publicly available online)</li> <li>• contact registers purchased from external service providers</li> <li>• based on different forms of contact (email, telephone, appointments, events)</li> </ul>
<b>Authorised surrendering of data to third parties (recipients of personal data)</b>	None.
<b>Surrendering or transfer of data to outside the EU or EEA</b>	None.
<b>Principles of protecting data held in the data file</b>	<p><b>Manually produced material:</b> Paper material is stored in a locked archive.</p> <hr/> <p><b>ADP material:</b></p> <ul style="list-style-type: none"> <li>• The electronic information systems of the data file are protected by appropriate technical measures, including e.g. regular operating system and application updates, encrypted connections to the environment, and a secure network environment.</li> <li>• Access rights are protected by a personal username and password.</li> <li>• Access to data is restricted to authorized users.</li> <li>• Access is determined by work related duties.</li> </ul> <p>The above information has not been classified as confidential but some data (e.g. orders, invoicing) are confidential.</p>



<p><b>Storage, archiving and destruction of data</b></p>	<p>Data retention is based on KAMK's information management plan and current legislation.</p> <p>Basic personal data is retained in the customer and stakeholder data file for as long as the customer relationship is valid. KAMK removes the personal data of representative(s) of customer organisation(s) (registered contact person) from the data file if informed that such person(s) have left the service of the customer organization or no longer represent the customer organization. Personal data will also be deleted from the data file if the data subject withdraws consent.</p> <p>Data related to KAMK's service activities are stored in the customer and stakeholder data file for ten years from the end of the calendar year in which the matter was resolved.</p> <p>Data belonging to specific categories of personal data shall be deleted immediately when no longer needed for the original purpose of use.</p>
<p><b>The data subject's right to access personal data</b></p>	<p><b>Data subject's right of access to own data ("verification right")</b></p> <p>Data subjects have the right to receive confirmation as to whether personal data concerning them are being processed or not. If their personal data are being processed, the data subjects are entitled to gain access to their personal data. The data controller has the duty to provide the data subject with a copy of the personal data being processed.</p>
<p><b>The data subject's right to rectify (correct) data</b></p>	<p><b>Data subject's right of rectification</b></p> <p>Data subjects have the right to demand that erroneous, inaccurate or incomplete personal data be rectified or supplemented by the data controller without undue delay.</p>
<p><b>Other rights of the data subject</b></p>	<p><b>Right to portability (transfer of data from one data file to another)</b></p> <p>In certain situations, the data subject has the right to receive personal data she/he has surrendered to a controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another data controller.</p> <p>This right only applies to situations where data processing is automatic and is based on consent or contract.</p> <p><b>Right to have data deleted/erazed</b></p> <p>In certain situations, the data subject has the right to request that his/her personal data be erased without undue delay.</p> <p><b>Right to object to processing, automatic decision-making and profiling</b></p> <p>In certain situations, the data subject has for reasons specific to the said person's situation the right to object at any time, to the processing of his/her personal data, which by law is based on the public interest, the exercising of public power or legitimize interest.</p> <p>The right to object to processing does not concern data that is legally pro-</p>



cessed in order to fulfill legal duties.

The data subject has the right not to be targeted by automated decision-making, such as profiling, which has legal repercussions for the data subject or which significantly affects the data subject in a similar manner.

The above paragraph shall not apply if the decision, for example:

- is necessary for the conclusion or implementation of the contract between the data subject and the controller
- has been adopted in accordance with Union law applicable to the controller or the law of a member state, which also stipulates appropriate measures to protect the data subject's rights and freedoms and legitimate interests;
- is based on the express consent of the data subject.

#### **Right to restrict processing of data**

In certain situations, data subjects may have the right to restrict the processing of their personal data.

#### **Right to withdraw consent**

Data subjects have the right to withdraw their consent for processing their personal data at any time without affecting the legitimacy of processing performed before the withdrawal of consent.

#### **Right to lodge a complaint with the supervisory authority**

Data subjects shall lodge a complaint with the supervisory authority, if they consider that the processing of personal data relating to them infringes data protection regulations. Contact information: Office of the Data Protection Officer: PL 800, 00521 Helsinki. Telephone exchange: 029 566 6700. Email (Records office): tietosuoja(at)om.fi

The data subject will receive the necessary data described in this notice and collected from the data subject or any personal data not obtained directly from the data subject.

Surrendering personal data is not required by law. The data subject is not obliged to provide personal data and not providing personal data will not incur any consequences. However, surrendering personal data can be based on an agreement/contract or setting up an agreement and thus can be required to purchase services offered by the data controller.