



## **Development of student data protection culture through privacy policy update in Laurea University of Applied Sciences**

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Laurea University of Applied Sciences

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This thesis stemmed from the project initiated by Laurea University of Applied Sciences data protection officer, with the goal of developing Laurea's student privacy policy statement. The project was focused on the English language version of the privacy policy statement, with an emphasis on including necessary information for exchange and foreign students.

The research goal was to find out that how the Laurea student privacy policy statement could be made more reader-friendly. In addition, it became evident during the project that there was a need to research the data processing practices that take place with exchange and foreign students.

The research methods included content analysis and semi-structured interviews. Content analysis was used as a quantitative research method to analyse other universities of applied sciences privacy policy statements. The findings of the content analysis helped determine the content of the privacy policy statement. Semi-structured interview was used as a qualitative research method to gain more knowledge about exchange and foreign student data processing at Laurea. Staff from Laurea's international department was interviewed in the research. The interview made it clear that the most relevant privacy policy for exchange and foreign students is the SoleMOVE privacy policy. It was then determined that the privacy policy developed in this thesis did not need as much exchange and foreign student specific information.

The literature chosen for the thesis consisted of: relevant legislation, information security related literature and research guides. The legislation was necessary to assure that the privacy policy statement would cover all the necessary aspects. The European Union's General Data Protection Regulation requirements dictated heavily the content. Information security related literature provided knowledge about personal data, privacy policies and information security in general. The research literature was used to support the research conducted.

As a result of the research and the development process a new privacy policy statement was created, using the knowledge from the literature and the research findings. The result was a summarized and simpler version, still containing all necessary elements. The creation process was done in dialogue with the data protection officer.

Keywords: personal data, privacy policy, information security, general data protection regulation

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Tämä opinnäytetyö pohjautuu Laurea-ammattikorkeakoulun tietosuojavastaavan antamaan projektiin, jonka tavoitteena oli kehittää uusi opiskelijoiden tietosuojaseloste. Projekti keskittyi englanninkieliseen selosteeseen ja täten ulkomaalaisten ja vaihto-opiskelijoiden tietojenkäsittely oli erityisen huomion alla.

Tutkimuksen tavoite oli selvittää, että miten Laurean opiskelijoiden tietosuojaselosteesta voisi tehdä lukijaystävällisemmän. Tämän lisäksi projektin aikana tuli ilmi, että ulkomaalaisten ja vaihto-opiskelijoiden tietojenkäsittely prosessia olisi myös tarvetta tutkia kehitystyön kannalta.

Tutkimusmenetelmiksi valikoitui sisältöanalyysi sekä teemahaastattelu. Sisältöanalyysiä käytettiin kvantitatiivisena tutkimusmenetelmänä, jossa analysoitiin muiden ammattikorkeakoulujen opiskelijoiden tietosuojaselosteita. Tavoitteena oli saada vertailukohtaa ja tukea kehitystyön päätöksentekoon. Teemahaastattelua käytettiin kvalitatiivisena tutkimusmenetelmänä, jossa tavoitteena oli kerätä lisätietoa ulkomaalaisten ja vaihto-opiskelijoiden tietojenkäsittelystä. Haastateltavana oli Laurean kansainvälisen osaston henkilökuntaa. Haastattelussa selvisi, että SoleMOVE järjestelmän tietosuojaseloste on ulkomaalaisten ja vaihto-opiskelijoiden kannalta kaikista oleellisin tietosuojaseloste, joten heihin liittyvät erityismaininnat jätettiin uudesta tietosuojaselosteesta pois.

Kirjallisuus koostui lainsäädännöstä sekä tietoturvaluuteen ja tutkimukseen liittyvästä kirjallisuudesta. Lainsäädäntö oli keskeisessä roolissa tietosuojaselosteen sisällön kannalta. Euroopan Union tietosuoja-asetus saneli pitkälti selosteen sisällön. Tietoturvaluuteen liittyvä kirjallisuus tarjosi tuntemusta henkilötieto asioihin, tietosuojakäytäntöihin ja yleisesti tietoturvaluuteen. Tutkimukseen liittyvä kirjallisuus antoi tietoa tutkimuksen suorittamista varten ja tutkimustulosten analysointiin.

Tutkimustulosten ja kehitystyön lopputuloksena oli uusi tiivistetty tietosuojaseloste. Tietosuojaseloste luotiin tutkimustuloksiin ja kirjallisuuteen pohjautuen. Kehitystyö tehtiin yhteistyössä Laurean tietosuojavastaavan kanssa, joka ohjasi tietosuojaselosteen valmistumista.

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## 1 Introduction

The European Union's (EU) General Data Protection Regulation (GDPR) that came into force in May of 2018 has been the talking point in the world of information security and privacy over the last few years. It has also been the headache for many organizations, who are trying to comply to the regulation while continuing their business operations. The goal of the regulation is to give individuals more control of their personal data. (European Union 2016, article 1) Individuals could feel the induction of the regulation in May 2018, mostly in the way of dozens of emails and new privacy policies asking for consent in handling of personal data. The regulation set out clear standards for privacy policies and notices for organizations. Laurea University of Applied Sciences was of course one of these organizations as well. Laurea updated their student privacy policy statement last year, in order to comply with the regulation.

The EU GDPR demands the use of clear and plain language and transparency in communication regarding the processing of personal data. In plain language, this means that privacy policy statements cannot be the endless litany of legislation quotations and institutional text, that they once were. All actions of processing, as well as the rights of the data subject shall be easily understandable. (European Union 2016, article 5)

The data protection officer of Laurea gave the development project of creating an easily readable, summarized privacy policy statement for Laurea students. The idea was that the privacy policy statement created by Laurea in 2018 when the EU GDPR was inducted, was too long and dreary and for that reason also easily overlooked. A student perspective was desired and therefore the idea was to give the student full liberty in terms of design and content, as long as the GDPR requirements were followed. There weren't many boundaries determined, however the one of the main points discussed in the planning process was to make it less formal, trying to put it more into "layman's terms".

The hypothesis is that a simpler and summarized version would be more effective, in terms of being read and perceived by students and therefore develop Laurea's student data protection culture. A privacy policy statement is required by the GDPR, so having one is not really a matter of choice but raising awareness and increasing student knowledge and interest of the subject could be beneficial in many ways. Most policies, in general, go unread and overlooked. Raising awareness of security issues through education and informing is a part of an effective information security culture. (Gardner & Thomas 2014, 25-26)

## 1.1 Research question and goals

The research question was determined by the thesis worker in consultation with the thesis supervisor. The thought-narrative was to figure out a question which answer would serve the thesis subject optimally. The goal was to create a new student privacy policy statement, that would be more appealing and easily readable. It was then determined that the following research question would be suitable for the subject:

**How can the Laurea UAS student privacy policy statement be made more reader-friendly?**

The research goal was to answer the research question and therefore provide applicable data for the creation of the new privacy policy statement. The chosen research methods were content analysis and semi-structured interviews.

The research question was chosen because of a few factors. First and foremost, it was essentially the task that was given by the data protection officer. The objective was to create a new privacy policy statement, that would be more reader-friendly, up to date and contain all necessary information with a special emphasis on foreign and exchange students. Secondly, if the privacy policy statement was more reader-friendly, it would be more appealing, and the more students read it the more it raises awareness and improves their knowledge about the subject. This would be a development of both student data protection culture and organizational information security.

It was then determined that what would reader-friendly actually mean in the context of this project. This was discussed with the thesis worker and the data protection officer and the discussion provided some objectives. Firstly, it was decided that the new privacy policy statement needed to be shorter, a more summarized version. It should be as much as possible in “layman’s terms” and all references to legislation should be kept to the minimum. Essentially, everything unnecessary should be left out. The thought process was that the old student privacy policy statement could serve as back up, giving more detailed information when needed. The new version should only contain the most essential and necessary information. Content analysis was picked as a research method to help determine what could possibly be left out and what couldn’t.

As the project went on, the research derailed to an extent from the research question. The need to study exchange and foreign student data processing in Laurea became evident, so it shaped the theme for the other research method, semi-structured interview. The data protection officer of Laurea felt that it would be beneficial to find out if something regarding foreign and exchange students was lacking in the old privacy policy statement, that could be

mentioned in the new one. As this thesis focused on the English version of the privacy policy, it was also more relevant to focus on foreign and exchange students.

## 1.2 Case company: Laurea University of Applied Sciences

Laurea University of Applied Sciences Ltd, is a university of applied sciences operating in the Uusimaa region in Finland. It has a total of six campuses, located in: Leppävaara and Otaniemi (Espoo), Tikkurila (Vantaa), Porvoo, Lohja and Hyvinkää. Laurea is the most popular university of applied sciences in Finland, by the number of applicants in the joint application process. There is a total of 16 bachelor's and master's degree programmes in Laurea, of which six are in English language. Laurea has around 7800 students in total and 1500 bachelor's programme graduates and 180 master's graduates each year. In the spring of 2018 there are over 24 000 Laurea graduates. Laurea has an annual turnover of 52 million euros. (Laurea 2019)

Laurea University of Applied Sciences began its operations originally as Vantaa/Espoo University of Applied Sciences in 1992. It was one of the first universities of applied sciences (UAS) in Finland. After experiencing different changes in name and ownerships during its early years, the current name Laurea University of Applied Sciences name was established in 2001. (Laurea 2019)

Jouni Koski is the president and chief executive officer (CEO) of Laurea, acting as chairman of the management team. The rest of the management team consists of vice presidents, directors, managers and student union representatives. The goal of the management team, as stated on Laurea's website; *"is to assist the President in leading and developing Laurea."* (2019) Laurea is also an employer, having around 500 staff members. (Laurea 2019)

The EU GDPR requires Laurea to have a designated data protection officer, as Laurea processes personal data on a large scale. (European Union 2016, article 37) Laurea's current data protection officer is Marjo Valjakka. The data protection officer is the first person to be contacted in matters related to personal data processing. It is also the data protection officer's task to ensure that Laurea's compliance of the EU GDPR as well as national legislation. (European Union 2016, article 39)



## 2 Theoretical framework

The theoretical framework for this thesis includes personal data, information security, privacy policy and most relevant legislation which is the EU GDPR and Finnish legislation, in context of the topic. The definitions and the legislation will be analysed in the following sub-chapters, both from a general standpoint and in the context of the thesis subject and Laurea University of Applied Sciences as an organization.

The literature used in this thesis focused on research and information security. As the EU GDPR is still a recent topic, there is not a long history of research and theses about the topic but in the last year many theses have been done, mostly about organizational adjustments to comply to the GDPR. The literature about the GDPR is still shallow. Because of the specificity of the thesis subject, the previous theses and research did not provide a lot of reference. Information security literature provided knowledge about privacy policies, data protection and information security management.

The research literature was used to gain knowledge about different research methods and being able to choose and use them correctly. It also provided knowledge about how to analyse data as well as an understanding of good research principles. The literature supported the entire research process.

### 2.1 Personal data

In this thesis personal data is described and considered the way it is defined in the EU GDPR, as it makes most sense in this context, because Laurea along with other organizations fall under the jurisdiction of the EU GDPR. This removes possible misinterpretations and conflicts with other definitions of personal data and the EU GDPR. It also clarifies what falls under the category of personal data. Personal data, as defined in the EU GDPR: *“...any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;”* (2016, article 4).

In essence, any single or combined information that relates to a natural person is considered personal data. It is not enough that the information leads to the identification of the natural person, the information must concern them, hence relate to them. This information such as: name and surname, identification card number, home address, medical records and IP address. Data that is truly anonymous or considered public information such as company registration number, company e-mail, or encrypted data is not considered personal data. (European Union 2016) Personal data may also at times, both in this thesis and in general, be referred to as personal information.

Personal data is protected by law. In Finland personal data is protected by e.g. Tietosuojalaki (1050/2018), Act on the Protection of Privacy in Working Life (759/2004), Decree on the Openness of Government Activities and on Good Practice in Information Management (1030/1999) and the EU GDPR. There are several others in addition that include personal data protection in different contexts and to different extents, but Tietosuojalaki (1050/2018) and the EU GDPR are most focused and specified on personal data. The right to privacy is considered a basic right, in article 12 of the United Nations Universal Declaration of Human rights. (United Nations n.d.)

The development of technology and the internet has enabled the access to massive quantities of personal data. Personal data can be used for many purposes, including illegal ones such e.g. as identity theft, espionage and fraud. If someone's credit card or passport is stolen physically, it can create a lot of damage. If there is a case such as the data breach of US Office of Personnel management where 21.5 million records that included very sensitive data of employees and their families was stolen by criminals, the value for the criminals can be massive and the damages for the victims can be massive as well. (Massé 2018) Personal data is also necessary for many non-illegal activities, such as e.g. different population registers, hospitals, schools and different service providers (e.g. Google and Facebook). There still needs to be regulation, even though the intentions of the "controllers" wouldn't be inherently bad. The control of the personal data should always remain with the person (data subject) and how the personal data is used and stored needs to be regulated by law. (Massé 2018)

Laurea as a university of applied sciences has both the need and obligation by law to collect, transfer and store personal data. Laurea uses personal data in their own operating systems to hold a registry of students, their studies and to share some data to different authorities and service providers. Different legislation, which will be covered later, requires Laurea to store personal data both permanently and temporarily. If there was a situation where a student would want to exercise their right, as defined by the EU GDPR, to erasure or to be forgotten, it would only be possible for the personal data that was gathered with their consent and not on a legal requirement. If Laurea collects personal data for marketing purposes or other use that doesn't have a legal basis, it is always based on the consent of the data subject. (Laurea 2018)

## 2.2 Information security

Information security is a broad term. It is the protection of information through technology and data systems, through training and policies. It can be further split into subcategories, such as e.g. network security, computer security and policies. The main goal is still the same, keeping information secured. Whitman and Mattord defines the state of being secure in an information security context as: "*...to be protected from the risk of loss, damage, or unwanted modification, or other hazard.*" (2014).

The protection of personal data is extremely relevant in information security. Secured networks and hardware, access controls, privacy policies and management are all necessary elements of appropriate data protection. As it was previously stated, personal data has value in many ways, so it should be protected accordingly. The laws and regulations also require data controllers to follow appropriate securing practices. (Whitman & Mattord 2014) Larger organizations might have a designated information security manager/specialist, who is responsible for all matters information security related. The EU GDPR requirements means that all organizations meeting certain thresholds in regard to processing of personal data, are required to have a data protection officer. It's still worth to notice that all members of the organization are responsible of upholding proper information security and following policies set by the manager. A risk assessment is a necessary part of data protection, to understand what the risks are and how to take appropriate measures. The EU GDPR article 35 "Data protection impact assessment" lays out the principles of how the assessment should be carried out. (European Union 2016)

Personal data is transferred and stored mostly electronically. A vulnerability assessment is used to find weaknesses in an information security system. It would be useful for Laurea to involve the entire data process which includes partners, students, third-parties in the assessment. Through the assessment security risks, vulnerabilities, could be identified and proper security measures and policies could be introduced as a result. A vulnerability assessment would involve the identification of vulnerabilities and rating them high risk-low risk. (Vacca 2013, 201)

## 2.3 Legislation

The legislation around this is revolved around two main components that affect Laurea: the European Union's General Data Protection Regulation and Finnish legislation. The legislation in this thesis will only focus on the most relevant legislation in terms of personal data and data protection.

### 2.3.1 The General Data Protection Regulation (EU)

The European Union's General Data Protection Regulation was adopted in 2016, replacing the Data Protection Directive which had been set in 1995 and did not by any standards meet today's requirements. The technological development in the last 20 years has erupted and the old directive wasn't serving its purpose anymore. The directive was a goal set for EU countries to achieve through their own legislation, while the regulation is a binding legislative act that must be applied throughout Europe. There is a great difference in the effectiveness of a regulation and a directive. (EUGDPR.org n.d.) Over the last years, it has really been discovered how much different tech companies control data over people, without much regulation. Knowledge is power and the amount of power that these private companies hold through

information is enormous. The EU's GDPR was established to protect individuals' rights and privacy, by bringing regulation for all organizations and individuals handling personal data within the European Union and the European Economic Area. (Rossow 2018)

The EU GDPR applies to all organizations, businesses and individuals of the 28 European member countries, and everyone operating within it e.g. US based company operating within the EU, EU based company operating in the US. It does not apply to individuals using personal data in personal use, as an example given by the European Commission: "An individual uses their own private address book to invite friends via email to a party that they are organising..." (2019). As soon as there is a financial or professional connection, it falls under the jurisdiction of the GDPR.

The regulation brings a lot more control of personal data and rights to personal individuals. A summary of the individual persons rights: The right to know about how personal data is being processed. The right to know what data is being held. The right to ask for correction of data e.g. incomplete, inaccurate and incorrect data. The right to erasure of data after it is no longer needed, or its use is not legally justified. The right to refuse or restrict the use of personal data for e.g. direct or indirect marketing purposes, certain research and statistical purposes or "...on grounds relating to your particular situation". The right to have your personal data transported in a machine-readable format to another controller. The right to request a natural person to for decision-making in automated processing situations. (European Commission 2019)

All these rights create a significant demand for complying organizations. More or less any file, database or record with something regarded as personal data (as defined in chapter 2.1) falls under GDPR jurisdiction. Organizations, individuals handling data are referred to as "controllers". The GDPR defines controller as: "*'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;*" (2016, article 4). Processor is a person or organization which processes data for the controller. (European Union 2016, article 4)

Not complying to the GDPR can lead to significant monetary fines, as many large corporations have already been made aware of. Member states respective authorities shall determine the fines and penalties, using the criteria set in the GDPR. (European Union 2016, article 83 & 84) When the GDPR came into force 2018, on the first day May 25, a complaint was filed against Google in France, eventually leading to fines of 50 million euros. (Fox 2019)

### 2.3.2 Finnish legislation

The most relevant Finnish legislation that applies to Laurea UAS regarding student personal data, as stated in the Laurea privacy policy statement (2018): Universities of Applied Sciences Act (932/2014), Act on national study and degree registers (884/2017), Administrative Procedure Act (434/2003), Administrative Judicial Procedure Act (586/1996), Act on the Openness of Government Activities (621/1999), Act on the Openness of Government Activities (621/1999), Decree on the Openness of Government Activities and on Good Practice in Information Management (1030/1999), Statistics Act (280/2004), Act on Financial Aid for Students (65/1994), Unemployment Security Act (1290/2002), Government Decree on financial aid for students (869/2017) and Tietosuojalaki (1050/2018) (Data Protection Act). A translation of Tietosuojalaki (1050/2018) is yet to be released.

The Finnish legislation creates legal obligations for Laurea to collect, process and transfer personal data. The requirements are very widespread and detailed throughout the listed legislation. In the context of the thesis and the privacy policy the main points are as summarized: The educational task based on Universities of Applied Sciences Act 932/2014 gives Laurea the right to have a register and to process personal data e.g. student and study information. Laurea transfers student and study-related information to the national data repository, the VIRTATA data service as well as to other authorities. The transfers have a legal basis and is not based on consent of the data subject. Laurea can only restrict the use and erase personal data of students to the extent that it is possible, in matters that are based on consent and don't have a legal basis. Certain student and study-related information cannot be removed, so technically a student cannot be "forgotten". The legislation also requires Laurea to follow appropriate data protection measures, as well as to restrict the processing of personal data to the extent that it is needed and to restrict the access to personal data to only those operating on a legal basis. (Laurea 2018, Universities of Applied Sciences Act 932/2014, Tietosuojalaki 1050/2018, Laki valtakunnallisista opinto- ja tutkintorekistereistä 884/2017)

### 2.4 Privacy policy

Policy is generally used to describe an organization's plan, action. It can describe a single action, e.g. an organization does not condone smoking indoors, or describe multiple actions or more simply an action plan. Generally, an organization has several policies, e.g. employee health care policy, employee code of conduct or safety policy. Policies are used as guidelines and information sources and are often required by law e.g. safety policy. Whitman and Mattord (2014) lays out three basic rules for policies; they should never conflict with the law and should withstand in court and finally, they need to be actively administered and supported. A policy does not give a freedom of responsibility to any organization. (Whitman & Mattord 2014)

Privacy policies are can often be found on websites, generally informing the users of how their information is being gathered, how it is used and if it is shared with a third-party. They generally require the user to “accept” the policy in order to continue. The titles can sometimes be “terms of service” or “user agreement”, and even include more than the privacy policy. Privacy policies are however not only limited to IT companies or website operators, but any organizations/individuals handling information regarded as personal data. Privacy policies are so common and widely used these days, that an organization may even use a privacy policy as a notice that they are not collecting any data. (TermsFeed 2018)

The EU GDPR requires organizations/individuals classified as data controllers, to give a privacy notice to data subjects. Articles 13 and 14 of the EU GDPR details how data controllers need to inform data subjects. Following is a summary of the key points. The data controller needs to inform the data subject of: The controller’s identity and contact details e.g. possibly data protection officer, outsourced representatives. Identification of the data that is being collected. The data subject’s rights e.g. right to correction, erasure, objection. The purpose and legal basis for processing of personal data, how long the data will be stored. Any additional receivers of the personal data, third-parties. (European Union 2016, article 13 & 14)

One aspect of the EU GDPR is transparency and clarity, which are key elements of the new regulation. No longer can an organization drown their users with in an endless litany of legal text. Article 12 of EU GDPR: *“The controller shall take appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34 relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a child. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means. When requested by the data subject, the information may be provided orally, provided that the identity of the data subject is proven by other means.”* (European Union 2016, article 12)

The requirements set out by the EU GDPR played a major role in this thesis. They laid out requirements on the structure and content of the new Laurea student privacy policy statement. All the aforementioned information that data controllers need to notify data subjects of needed to be considered, with a focus on easily readable language. Making a privacy policy statement that was easily readable was one of the initial launching factors for the thesis. Laurea’s data protection officer didn’t feel like the old privacy policy statement served its purpose in that regard. However, it was decided that the old privacy policy statement would remain as support and a source for more detailed information, as it extensively covered Laurea’s privacy policy.

### 3 Research

Research is a very broad definition. There is essentially an endless amount of different forms of research, but research is fundamentally divided into two categories: basic research and applied research. Basic research is theoretical research, in the sense that it is looking to expand and developing knowledge while applied research is practical research, looking to solve and answer real-life problems and questions. (Surbhi 2017) Saunders (2009, 9) makes the case that basic research findings have a general use while applied research is usually specific, relating to a specific matter and organization. Here are some definitions from the literature. Sreejesh defines basic research as: *“refers to a focused, systematic study or investigation undertaken to discover new knowledge or interpretations and establish facts or principles in a particular field.”* (2013, 4). Applied research is defined by Bushaway as following: *“Applied Research is also original investigation undertaken in order to acquire new knowledge. It is, however, directed primarily towards practical aims or objectives.”* (2003, 18).

The research conducted for this thesis fell under the applied research category. There was a problem, and the research goal was to provide answers for the problem, together with existing knowledge and the literature. The research problem and context were also very specific, categorizing it as applied research. (Saunders 2009, 8-9) This thesis also relied on creativity, as the purpose was not to copy or create a similar document as an existing one, but rather use the research results as a resource, to make justifications and assist with decision-making.

#### 3.1 Methodology

The research methods chosen for this thesis were: content analysis and semi-structured interviews. The methods were chosen based on the research goals, on what data needed to be gathered. These two methods served that purpose. As the purpose of the thesis was to create new content, it was beneficial to have an in-depth look at other similar content, see what things were presented and how they were presented. This gave a general perspective to the thesis worker, of how other similar documents are laid out and what information they contain. Without any preconceptions it would be have been difficult to start formulating. The content analysis provided data for how certain chosen categories are presented in other UAS's privacy policy statements, and therefore establish an idea of how significant these categories have been deemed by other UAS or their subcontractor companies. As stated by Hakala (2003, 14), content analysis is well-suited for situations where you only have documentary evidence as data and the goal is to study the message.

The goal of the interview was to fill in the gaps and explore undiscovered aspects to the topic. With the right interviewees, staff who works with student data processing, the thesis worker was able to obtain necessary information about the organization's practices regarding student data transfer/protection. It was also very likely that information that hadn't been

even thought about would come up and be useful for the thesis. That was also one of the reasons that semi-structured interview was chosen as a method, to allow the interviewees to express themselves freely and open the possibilities for new discoveries.

### 3.2 Qualitative and quantitative research

Qualitative research as defined by Saunders, Lewis and Thornhill, “...refers to all non-numeric data or data that have not been quantified and can be a product of all research strategies.” (2009). Typical research methods that produce qualitative (descriptive) data are e.g.: interviews, different types of data analysis: case studies, content analysis, ethnomethodology and observations. (Taylor, Bogdan & DeVault 2015, 15-16, 23) Qualitative research is looking for underlying reasons behind phenomenon’s, trying to answer “how” and “why”. It is to different extent’s influenced by the researcher’s interpretation of different things and is undoubtedly influenced by personal thoughts and experience. (McLeod 2017)

Quantitative research gathers data in numbers, for instance statistics, rankings and different types of measurements. The data can be collected in various ways, e.g. surveys, content analysis, observations and experiments. A lot of the methods used in qualitative research can just as well be utilized for quantitative research, as any research method that can provide numerical data can be used for quantitative research. (McLeod 2017)

### 3.3 Content analysis

Content analysis is a research method that can be used for the collection of qualitative or quantitative data, or even a combination of them. It is an interpretation of any content, e.g. pictures, text, video, news articles, advertisements or interviews. Hakala makes the claim that: “*Content analysis allows us to treat qualitative data in quantitative terms, thus helping ground the analysis of images and words in rigorous, systematic classification rather than in individual interpretations.*” (2003,15). It can be applied for any type of studies, as it can be used for the analysis of any written, oral or visual communication. It can be used to study communication trends of organizations and institutions, which made it very suitable for the research purposes of this thesis. (University of Missouri-St.Louis 2004)

In this research content analysis was used for the collection of quantitative data. The goal was to determine the relevance of different topics for the privacy policy. This was done by picking four themes that were most debated to whether include them in the privacy policy statement. If the subjects would appear or not appear in other UAS’s privacy policies, it would give an indication of their necessity. However, the results of the content analysis would not solely decide the fate of any of these subjects, as they would eventually be determined by the thesis worker and finally by the thesis supervisor. If it turned out something could be useful for Laurea it could be used regardless of what the results of the content analysis are.



Four themes were established for the content analysis: foreign/exchange student specific information, mentions of security measures, listing of applying legislation and contact information. Foreign and exchange student specific information was chosen because it was since the beginning one of the focuses in the thesis and the research. It was also one of the areas that has raised many questions throughout the process. Any information that would be specifically directed towards exchange students, discounting GDPR and general information concerning them, would be counted. Mentions of security measures was chosen because of the security aspect of the thesis and the degree programme of the thesis worker. Listing of applying legislation and contact information were chosen to solidify the ideas and plans that the thesis worker and the thesis supervisor had established.

Eight Finnish universities of applied sciences public student, or general if student specific not available, privacy policy statements were chosen for the analysis. A conceptual analysis method was chosen. It began by identifying the research goal and then establishing categories, which were the themes that were presented earlier. Consequently, it was chosen that the aim was to look for existence and not for frequency, which means that it didn't matter if e.g. exchange student information would appear once or five times in the privacy policy statement, it wouldn't affect the results of the analysis. As long as it was found and existed, it would count and vice versa.

It was then decided that what would count and fall under the chosen categories. For exchange student information it was decided that any mentions that are outside of the GDPR, legal requirements and general information would count. To be counted as a mention of security measures, it needed to be something practical and specific, just a mention that "personal data is being protected", would not count but it needed to be some actual security measures that were used. Listing of applying legislation was simply just looking for a listing or more detailed categorization of applying legislation. For contact information any contact information such as: e-mail, name, phone number, person in charge would count. A set of rules is necessary in a content analysis to limit the subjective judgment of the researcher. (University of Missouri-St.Louis 2004) The results of the content analysis would then be analysed and used for context in the creation of the new privacy policy statement.

#### 3.4 Semi-structured interview

Semi-structured interviews are interviews where the interviewer has somewhat predetermined questions and themes, but the order and nature of questions can evolve with the flow of the conversation. Additional questions might develop during the conversation and the answers are open-ended. The answers (data) can be recorded as audio or as notes. (Saunders 2009, 320-321)

The nature of the semi-structured interviews allows the interviewer to understand the research topic and the underlying reasons for decisions and hear explanations. The open-ended answers and the “discussion” aspect of the interview can explore completely new aspects for the interviewer, and even the interviewee. This is particularly effective for more complex topics and topics that don’t have simple answers. (Saunders 2009, 323-325)

Semi-structured interviews research method was chosen for this thesis because of the “learning” aspect and the open-ended answers. It was quite probable that there were many aspects that haven’t been recognized and were unknown, that would be brought up in the interviews by the interviewees. In the context of this thesis and the research goals, the possibility of bias or unreliability in the interview answers was deemed low, as the purpose was to find out about different working methods and policies. There should be very little personal opinions or beliefs involved, just because of the nature of the topic. This reduced or removed the risk for unreliable results from the interviews. (Saunders 2009, 327-328)

It is important that the interviewer has an adequate level of knowledge in order to be able to understand the research topic and present questions that serve the research goal. In this thesis context (as well as in general) it is also important that the interviewee has enough information about the research that he/she is participating in. That way the interviewee knows what the interviewer is after and can answer questions accordingly. It also provides the interviewee and opportunity to prepare for the interview, perhaps prepare notes about the most important points. (Saunders 2009, 328-329) In this thesis, the person who was first inquired about the interview chose to bring in a person who was specifically educated in this topic. This could very well be a result of the detailed description of the interview theme and goals in advance, as was advised by Saunders (2009).

Even with the flexibility of the semi-structured interviews, it is important to keep in mind the different topics to be covered in the interview and avoiding redundancy, going in circles. The interview still has time restrictions, and it benefits to use the time wisely. To avoid wasting time, writing the topics and questions down and putting them in order is useful. Using a logical order is something to consider, to avoid bouncing from a topic to a totally different one. It will also reduce confusion for the interviewee. (Gilham 2005)

#### 3.4.1 Choosing the interviewees

Before choosing the interviewees, it was established that what is the goal of the interview; how does it serve the research and how does it relay to the research question? As the focal point in this thesis was the English version of the privacy policy statement, it was more aimed towards foreign/exchange students which means that it needs to contain all the necessary elements for them. It was decided by the thesis worker by consultancy of the thesis supervisor, that it would be beneficial to interview staff from Laurea’s international department, staff

who work with exchange/foreign affairs. The thought process was that they would have the best practical knowledge and a valuable insight into these matters. The goal was to learn more about the processes and data handling that takes place when students come to study here and when they go abroad. Additionally, the goal was to find out about any possible security issues or concerns. The themes that eventually shaped the interview-questions were: Find out about the personal data transfer processes that take place when students arrive to Finland or depart to other countries. Find out how student personal data is being handled. Find out how students give their consent to the use of their personal data and how they are informed of the different processes. Find out about security issues, past or present, regarding personal data storage and transfer.

Two staff members from Laurea's international department were interviewed together, and they chose to answer the questions that best suited their knowledge. Not all twelve (12) questions and their sub questions were answered specifically, as it was a semi-structured interview and the discussion took its own course at times. Some of the answers answered several questions and to avoid redundancy and disturbing the flow of the conversation they were left out. Only a few new questions arose during the interview and they were more about asking for details or to specify their point. The conversation at times derailed towards the SoleMOVE privacy policy statement and how it could be developed, as it was more familiar to the interviewees and more relevant in terms of exchange/foreign students. The interview was done completely in Finnish language. It was audio-recorded and transcribed afterwards. The interview questions can be found as an appendix (appendix 1, page 28).

## 4 Research results

### 4.1 Interviews

All exchange student personal data collection is done electronically, mostly via the SoleMOVE system. SoleMOVE has a privacy policy that the user agrees to upon registering in the system, giving their consent to the registering and processing of their personal data. There is a lot of personal data that is being collected, the full list can be found in SoleMOVE's privacy policy. The personal data is being used for reporting or other necessary use such as HOAS and Laureaamko. In other systems e.g. Peppi and SoleMOVE the data is stored for an unspecified amount of time, even after the student departs from Finland. The SoleMOVE system was taken into use in 2011. (Interview 21.2.2019)

So far there haven't been any major security issues related to the transfer of personal data, at least on Laurea's end and to the knowledge of the interviewees. There have been some human errors from other schools, where e.g. study records of several students have been sent to

Laurea, by accident. There hasn't been a situation yet where Laurea would have denied sharing information to other schools, based on unreliability of other issues. (Interview 21.2.2019)

Students are responsible of sharing their personal data with their destination schools for the most part. Laurea can assist with transferring personal data, but the documents and applications are done by the students and the sending requires their consent. Basically, by being a part of the exchange process and being registered in the SoleMOVE system the student has agreed and should be aware, of the fact that some of their personal data such as name, e-mail, will be shared with partner university in order to go on with the exchange process. (Interview 21.2.2019)

So far there hasn't been situations where students have denied sharing of their personal data, as it is a requirement to proceed with the exchange process. Neither has any student asked for erasure of their personal data, and if that would happen it would be at least technically possible but first it would have to be confirmed if some data must remain for legal purposes. (Interview 21.2.2019)

The identity of students coming from abroad is not really confirmed by Laurea, they rely on their partner schools conducting proper identification and the Finnish government when students must go through that process upon arriving in Finland. If the student doesn't have a Finnish social security number, they are not eligible to receive study credits. (Interview 21.2.2019)

There are differences in the requirements regarding personal data and its transfer, between different countries. Some schools might require very detailed information, anything from medical records to picture copies of passports. Usually the requirements are higher when going on exchange outside of the EU. On the other hand, Laurea treats exchange students the same, no matter which country they come from. (Interview 21.2.2019)

Through the interview results it became evident that SoleMOVE and its privacy policy is the most relevant privacy policy statement for exchange/foreign students. It is the privacy policy that all SoleMOVE users meaning all exchange students must agree to, in order to register to the system and be a part of the exchange process. This decreases the relevancy of exchange student specific information on the new general Laurea student privacy policy statement, as the information will be on the SoleMOVE privacy policy and is more likely to be read by the students. As the SoleMOVE privacy policy is most relevant for exchange students, it can be used as a point of reference in the new general student privacy policy, if more detailed information is desired. It can also be use as a source of information in the development of the new privacy policy statement.

## 4.2 Content analysis

Eight different universities of applied sciences public student privacy policies were picked for the analysis. Four research themes were determined and the appearance of these themes in the privacy policies was looked for. Only the presence, as determined by the rules, of the theme was looked for, meaning that frequency was not accounted for, as the purpose was to make a conceptual analysis with the focus on existence. The goal was to find out that how common these themes are in other UAS privacy policies, giving an indication of the importance of their existence in the privacy policy created in this thesis.

FOREIGN/EXCHANGE STUDENT SPECIFIC INFORMATION	SECURITY MEASURES	LISTING OF APPLY- ING LEGISLATION	CONTACT INFOR- MATION
2/8	6/8	1/8	8/8

Table 1: Content analysis research results

The results provided a good indication of the significance of different factors. The results were not a surprise, as most privacy policies follow the same basic formula that is focusing on the GDPR requirements. Many privacy policy statements are created by the same subcontractors. The numbers clearly point to security measure mentions and contact information being used for the most part. Only one privacy policy had no mentions of security measures and one only stated that “personal data is being protected” which didn’t qualify as a mention of security measures. The remaining six privacy policies all included to different extents detailed description of how data is being secured. Contact information is listed in more or less extensive ways on all privacy policy statements.

Only one privacy policy had a minor listing of different applying legislation, similar to the one that the old Laurea privacy policy statement has. The research pointed to the fact that mentioning applying legislation has been deemed unnecessary by other universities of applied sciences or their respective subcontractors in charge of creating their privacy policies. This was one of the original talking points with the data protection officer and the research confirmed the original idea of leaving the listing of legislation out or to the minimum.

Two out of the eight privacy policies included some specific information regarding exchange and foreign students. Even those two privacy policies only had minor footnotes referring to those students. There is a possibility that these UAS also have privacy policies specific to exchange or foreign students, that aren’t found on their websites or are linked to a system similar as SoleMOVE. However, as this thesis focused on the public student privacy policy

statement of Laurea, it made most sense to focus on other public statements. Private documents couldn't even be accessed or used in the name of good research ethics. The research results gave a good indication of the necessity of including exchange and foreign student specific information. As the statement created in this thesis and the statements included in this research were general student privacy policy statements, they should be designed to serve all students. Including too much exchange and foreign student information could possibly create confusion and greatly increase the length of the statement, which would've contradicted the goals of the project.

## 5 Recommendations

The recommendations given are focused on improving the security of personal data processing. They are based on the information security literature, regarding issues discovered in the thesis research.

Referring to the human mistakes in personal data processing discovered through the interview, it would be recommended to establish common policies with all parties in data transferring. The methods for data transfer and security levels should be assessed. Humans are the weakest link in any information security system and the appropriate measures should be established through a risk analysis. (Gardner & Thomas 2014, 22) Errors such as the ones discovered in the interview could cause reputation damages, decrease provider reliability and even decrease student interest in exchange opportunities, even if the errors have not been made on Laurea's end.

Another aspect that could be considered is to establish common standards with partners, as to what personal data is being gathered from students. The EU GDPR compiles organizations to avoid the processing of any unnecessary personal data. (European Union 2016, article 6) Through the interview it was discovered that different partner universities collect data to very different extents, some partners collecting very detailed information. It could be speculated that this would possibly be a violation of the GDPR. Laurea could try to propose full compliance of GDPR standards to the partner universities, to ensure that student rights are protected even outside of their capabilities. This also reinforces the importance of students knowing their rights and data controller's obligations, so that they can make educated decisions in regard to sharing their personal data. Laurea could also educate exchange students about possible risks in the sharing of personal data and the basics of data protection.

The thesis worker suggests that the new privacy policy statement would be published on Laurea's website as a separate document. It could be placed in the same area where the other privacy policy statements can be found. The thesis worker suggests that it would be clearly

distinguishable from the full privacy policy statement by the title. The title should give an indication that it is a summarized version and not the official privacy policy statement.

## 6 Conclusion

The research results indicated that the student privacy policy statement didn't need an emphasis on exchange and foreign students, as it was discovered in the interview that SoleMOVE's privacy policy is the main source for students enrolling in the SoleMOVE system, which is required for all exchange and foreign students. To follow the goals of the project, to develop a summarized policy statement, it was justified to leave out specific information to serve a larger audience. To develop data protection culture, the idea is to raise awareness, so adding information that doesn't concern the majority of the students would be counter-intuitive. As a result, the privacy policy statement didn't go into much depth about exchange and foreign student specific information. SoleMOVE's privacy policy will be referred to for exchange and foreign student specific information.

The new privacy policy statement is two pages in length, summarizing all necessary elements from the old privacy policy statement, which was nine pages long. It is designed in a questions and answers format, where the different topics are presented as questions from a student's perspective and providing answers and explanations as the data controller, Laurea. The goal was to try to restrict the amount of information shared, following a need to know basis. The idea was that the old privacy policy statement could still be used for further information, which allowed to cut back on the information shared in the new statement. The goal was to write the new privacy policy in a more plainspoken and simpler way, so that the content would be easily understood even with less knowledge about the topic. The privacy policy statement created in the thesis is aligned with the goal of thesis and the research question "how can the Laurea UAS student privacy policy statement be made more reader-friendly?". The success and use of the new privacy policy statement will be determined by Laurea's data protection officer. The privacy policy statement created in this thesis can be used as a foundation for the Finnish version or other future development projects.

In this development project thesis, the research had a supporting role, meaning that it was designed and used to find information and assist the decision-making in the creation process. The methods were chosen according to the research needs. Chosen methods were suitable and serving the purpose of the thesis. Other Finnish universities of applied sciences privacy policies that were chosen for the content analysis were a suitable baseline to analyse. They operate in the same region under the same laws and regulations. The interviewee chosen for the semi-structured interview was the correct person to answer the chosen questions. The

interviewee was able to answer all the necessary questions regarding exchange and foreign student data processing.

For future research topics it could be beneficial to study the level of knowledge that people have regarding personal data and the different legislation. It would give a more accurate indication of how detailed or simple, privacy policies should be. Something that should also be given thought to is that what is the best way to present a privacy policy, what captures the attention of the audience? Could the same message be transferred into different forms, such as video or audio, and what form of communication could reach a larger audience? These are questions that require research but would benefit the organization in raising awareness regarding these issues. As privacy policies are unavoidable today, it is worth investing effort and time into developing a policy statement that is effective and represents the organization's investment in information security.



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## Appendix 1: Semi-structured interview questions

The following questions will serve as the interview questions in this research. The goal is to follow the order that they are presented here to some degree, but if the discussion takes a different direction the order and questions can be modified.

To be expressed in the beginning of the interview:

The goal of the interview is to gather information for the development of the Laurea student privacy policy statement. As the focus is only on the English language version, there is an emphasis on foreign- and exchange students. If there are topics and ideas that are not covered by the questions, feel free to express them. If the questions involve things that you cannot share in this interview, feel free to deny answering them or answer to the best of your capabilities.

Semi-structured interview questions:

1. What personal data do you gather from students that come from inside/outside of the EU/EEA area?
2. How do you obtain this data?
3. For what purposes is the personal data collected?
4. What personal data is archived after a foreign student returns to their home country and for long how is it kept?
5. How do you confirm the identity of students coming from abroad? Inside/outside of the EU/EEA area?
6. Have you faced any security issues with handling of this data, or have you heard about the counterpart having issues with the handling of personal data?
7. Have you ever denied sharing personal data to other schools/organizations, based on unreliability? (e.g. when a Laurea student has gone abroad for exchange)
8. Do you share student personal data with schools inside/outside of the EU/EEA area? In case yes, what data is being shared?
9. Do you ask for consent from each student? (for the use and sharing of their personal data? How do you ask for their consent?
10. Do you inform students for what purposes their personal data is being used/stored? How do you inform them?

11. Are you familiar with the current Laurea student privacy policy statement? If you are, do you think it's serving its purpose, or does it need improvements?
12. If you have anything to add to the subject, please feel free.

Appendix 2: Content analysis table

<b>THEME:</b>	<b>FOREIGN/EX- CHANGE STU- DENTS SPECIFIC INFORMATION</b>	<b>SECURITY MEASURES</b>	<b>LISTING OF AP- PLYING LEGIS- LATION</b>	<b>CONTACT IN- FORMATION</b>
<b>Metropolia UAS</b>		X		X
<b>Haaga-Helia UAS</b>	X	X	X	X
<b>Lahti UAS</b>				X
<b>Centria UAS</b>		X		X
<b>Diaconia UAS</b>		X		X
<b>Häme UAS</b>		X		X
<b>JAMK UAS</b>	X			X
<b>Turku UAS</b>		X		X

(Total: 8)



## STUDENT PERSONAL DATA PROCESSING AT LAUREA

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### HOW IS MY PERSONAL DATA COLLECTED?

- Laurea University of Applied Sciences collects the necessary information through different channels, such as the Population register center, registers maintained by the Finnish National Agency for Education (Opintopolku and OILI), Laurea's own systems (Peppi, user management system, teacher updates) and through application processes outside of the Opintopolku system. Foreign and exchange student's information is gathered through Laurea's own system SoleMOVE, the application process and through partner universities.

### WHY IS MY PERSONAL DATA BEING COLLECTED?

- Laurea needs your information for different purposes. It needs to uphold a register of past and present students, for certificates, reports and to transfer data to the national data repository (VIRTA data service) and other authorities. Data is also needed to perform educational administration tasks, to administer student exchange and placement agreements and mobility information, as well as to look after your rights and interests. The use of a register and the right to process data are based on legislation concerning universities of applied sciences. The use of your personal data for any other purposes (e.g. marketing) is always based on your consent.

### WHAT DATA IS BEING COLLECTED?

- Laurea only collects data that it needs to perform its educational administration task and to run its operations (planning, implementation, monitoring and reporting). The data collected is personal information (e.g. name, nationality, previous education), study related information (e.g. degree programme, student ID, study plan) as well as attendance and international mobility related information.

### HOW IS MY DATA SHARED?

- Your data is used internally for educational and administrative purposes. Externally Laurea transfers necessary information to the national data repository, from which most authorities and other services with legal rights collect information. In addition, the data is being disclosed to Laurea's user management system, library system, other universities (if you are participating in their studies) and LAUREAMKO. Your personal data will not be transferred outside the EU/EEA, except in specified cases.

## HOW IS DATA BEING STORED AND HOW IS IT SECURED?

- The personal data is stored based on the requirements of legislation. Specific data such as e.g. graduation data, attendance information and study entitlement are stored permanently in Laurea's information systems. Other data e.g. student welfare documents and exam related information are retained for a specified period. Manual data is kept inaccessible from unauthorized persons in safe conditions. Electronic data is kept safe through appropriately protected network and systems and access rights are limited. Only authorized Laurea staff can access your data, to the extent that they are required and legally justified.

## HOW CAN I ACCESS MY PERSONAL DATA?

- As an attending student, you have can check what information is being registered, this is easily done via user interfaces Pakki and SoleMOVE (exchange students). You also have the right to receive an official study certificate and a transcript of records from the student affairs office. Current and former students can check the information that is being held once a year, free of charge. This is done by a request to the student affairs office of the student's own unit.

## WHAT ARE MY RIGHTS?

- You have the right to know what personal data is being stored and for how long. You have the right to ask for correction of your personal data if you notice an error, but in most cases, you can correct the information through the student user interfaces (Pakki, SoleMOVE). You also have the right to erasure, to the extent which it is possible.

## CONTACT INFORMATION

At Laurea we will always handle your personal information with care, but in the event that you wish to exercise your right to file a complaint or have any concerns regarding your personal data you can contact Laurea's data protection officer **Marjo Valjakka** (09 8868 7658).

You can find more detailed information [here](#).