

PRIVACY NOTICE

**Stakeholder management at LUT Universities
EU's General Data Protection Regulation (2016/679),
Articles 13 and 14
Date: 20.3.2025
Updated:**

This privacy notice describes the processing of the personal data of the stakeholders of the LUT Universities (LUT University and LAB University of Applied Sciences) which the LUT Universities carry out in their joint stakeholder management system. In addition, the processing of personal data of certain LUT Universities' stakeholders has been described in the following stakeholder-specific privacy notices:

Continuing Education [LUT](#) / [LAB](#)
Alumni [LUT](#) / [LAB](#)
[Company cooperation in studies and recruiting](#)

1. Data controllers

LUT University (LUT)
Business ID: 0245904-2

Lappeenranta Campus
Yliopistonkatu 34, FI-53850 Lappeenranta, Finland
Postal address: P.O. Box 20, FI-53851 Lappeenranta, Finland

Lahti Campus
Mukkulankatu 19, FI-15210 Lahti, Finland

Tel. +358 29 446 2111 (switchboard)

LAB University of Applied Sciences (LAB)
Business ID: 2630644-6

Lahti Campus
Mukkulankatu 19, FI-15210 Lahti, Finland
Niemenkatu 73, FI-15140 Lahti, Finland

Lappeenranta Campus
Yliopistonkatu 36, FI-53850 Lappeenranta, Finland

Tel. +358 29 446 5000 (switchboard)

The data controller is the higher education institution with which the data subject has a stakeholder relationship. In some situations, LUT and LAB may jointly decide on the purposes and means of processing personal data, in which case they act as joint controllers.

2. Contact persons of the data controller

Continuing education (LUT and LAB):
Account Manager Sari Valkeapää
Phone: +358 40 535 1935
Email: sari.valkeapaa@lut.fi

RDI and Development (LAB):
Development Specialist Nina Tuominen
Phone: +358 50 577 2934
Email: nina.tuominen@lab.fi

Alumni relations (LUT and LAB) and company cooperation in studies and recruiting (LUT):
Service Manager Elina Hannikainen-Himanen
Phone: +358 40 573 3790
Email: elina.hannikainen-himanen@lut.fi

3. Data Protection Officer

Legal Counsel Ilona Saarenpää
Phone: +358 50 430 1072
Email: dataprotection@lut.fi

4. Purpose of personal data processing

At LUT Universities, contacts and interaction in working life are maintained in the Dynamics 365 CRM stakeholder management system, which is a centralized and structured place for maintaining stakeholder information, business processes and product information. LUT Universities use the CRM system to provide their continuing education and service customers, alumni, business partners and other important stakeholders with up-to-date information and material on training, events, RDI projects, various services and other activities and cooperation opportunities, as well as to maintain their relationships with these stakeholders.

The personal data of stakeholders is also processed to enable the operations of LUT Universities. The personal data can be processed, for example, for the purposes of working life cooperation in the teaching activities of higher education institutions or for arranging internships and thesis positions for students. LUT Universities also process the personal data of their stakeholders for the purpose of their service business, which refers to services offered to external customers. The business idea of the service business is to provide high-quality, productised or tailored expert services to companies, communities and individuals locally, nationally and internationally.

One of the statutory duties of LAB University of Applied Sciences is to carry out applied research, development and innovation activities, as well as artistic activities that serve education in universities of applied sciences, promote industry, business and regional development and regenerate the industrial structure of the region. LAB University of Applied Sciences engages in these activities, for example, in various RDI projects, where there is a need to process the personal data of stakeholders for the preparation and implementation of the projects and for project-related communication. Such stakeholders related to RDI activities include, for example, other partners participating in the same project, partners offering funding or other input to the project, and parties belonging to the project's target group.

Stakeholder management systems involve a user-oriented way of thinking and acting. The LUT Universities' CRM system is a tool for staff for communications and marketing, as well as for maintaining the information and functions of their own working life contacts. The information collected in the system is used to plan and monitor operations and to consider how to act with different stakeholders and strengthen relationships. It enables the identification of the needs of different stakeholders and thus the provision of better services for stakeholders. The contact

persons' information is in one place and can be used in marketing communications, communications and advertising. Immediate feedback is also collected in the system, which is compiled for the purpose of evaluating and developing services and operations.

The purpose of LUT Universities' stakeholder management is to maintain information related to LUT Universities' alumni, company and community information, and other stakeholders for the following purposes:

- Communication and information
- Marketing
- Advertising
- Paid service activities
- Cooperation with educational institutions and student recruitment cooperation
- Alumni relations
- RDI activities and business projects
- Product information management
- Continuing education
- Reporting for LUT Universities' own operations and their development
- Reporting to monitor the operation and use of services and to develop services

In addition, the processing of personal data of certain LUT Universities' stakeholders is described in more detail in the following privacy notices:

Continuing Education [LUT](#) / [LAB](#)

Alumni [LUT](#) / [LAB](#)

[Company cooperation in studies and recruiting](#)

5. Legal basis of personal data processing

The legal basis for the processing is

- the consent of the data subject;
- a contract;
- a task carried out in the public interest;
- the controller's legal obligation; and
- the legitimate interests of the controller.

In LAB's RDI activities and business projects, the processing of personal data may be based on

- consent of the data subject (e.g. consent to receive marketing);
- a contract, if the processing of personal data is necessary for the performance of a contract, such as the provision of a service ordered by the customer;
- the performance of a task carried out in the public interest, for example, when it is necessary to process data describing a person's position, duties or the performance of these duties in a public sector entity, business and industry, civil society organisations, or other corresponding activities in the implementation of a development project with public interest objectives (section 4, subsection 1, point 1 of the Data Protection Act); or
- the legitimate interests of the controller. There is a relevant relationship between the data subject and the controller (such as a customer relationship or other cooperation relationship in RDI activities), and the controller needs to process the personal data of stakeholders in the preparation, implementation and related communication of its RDI activities and business projects, as well as in the development of its own operations. Marketing and other communications may also be based on the controller's legitimate interests.

The processing of personal data of LUT Universities' own employees is based on the controller's legitimate interests. There is a relevant relationship between the data subject and the controller (employment relationship), and the controller needs to process personal data in order to keep track of licenses and to document stakeholder cooperation.

In connection with e.g. event registration, the data subject may be asked for information about a possible special diet, which may include information belonging to special categories of personal data. In this case, the processing of special categories of personal data is based on the explicit consent of the data subject (Article 9.2 (a) of the General Data Protection Regulation).

With regard to continuing education, alumni relations, and company cooperation in studies and recruiting, the legal bases for processing personal data are defined in more detail in separate privacy notices concerning such stakeholders:

Continuing Education [LUT](#) / [LAB](#)

Alumni [LUT](#) / [LAB](#)

[Company cooperation in studies and recruiting](#)

6. Personal data to be processed and retention periods

The personal data to be processed depends on the stakeholder group to which the data subject belongs.

We process the following personal data of the stakeholders related to LAB's RDI activities and business projects (e.g. partners participating in joint projects, partners providing funding or other input to the project, project target groups):

- First name, last name, former last name, gender
- Contact information (phone number, email address and, in some cases, postal address)
- Employer, title
- Information describing the implementation of the cooperation, such as information about participation in projects and events, as well as information related to offers made to the customer and services provided
- Newsletter subscriptions and other mailing list memberships
- Marketing permissions
- Information about contacting activities. LUT Universities contact their stakeholders for information and marketing purposes. Measures are also carried out in various RDI projects, for which contact persons in companies and organisations are contacted. Contacting activities can include emails, newsletters, appointments, and phone calls for which notes are taken and information recorded.

In the CRM system, we process the personal data of employees of LUT Universities who have a license for the CRM system or who have participated in activities related to stakeholder cooperation, such as the production of services. We process the following personal data about employees:

- Name
- Contact information (phone number, email address and, in some cases, postal address)
- Employer, title, unit, field of study
- Participation in meetings or other stakeholder collaboration activities
- License
- Log data related to the use of the system

In connection with fairs or other events, the data subject may provide their personal data to LUT Universities, for example, in order to receive communications from LUT Universities. In such case, the personal data provided by the data subject is processed. Such personal data may include, for example, name, contact information, and interests.

Stakeholders' personal data will be stored until the stakeholder relationship ends. The personal data is regularly reviewed to assess whether such a relationship still exists. Personal data may also be deleted if the emails sent do not reach the email address of the data subject. Organizations' decision-maker information may be updated automatically through Profinder, which means that outdated decision-maker information is also removed in connection with such updates. The data subject may also request the erasure of their personal

data, in which case the data subject's right to have their data erased will be assessed in accordance with data protection legislation.

The storage period of LUT Universities' employees' personal data is determined as follows:

- Licensee data is stored for the duration of the license
- Activity data describing participation in stakeholder engagement is retained for the same period as data for that stakeholder (e.g. the company that ordered the service).

With regard to continuing education, alumni relations, and company cooperation in studies and recruiting, the types of personal data processed and the storage periods are defined in separate privacy notices:

Continuing Education [LUT](#) / [LAB](#)

Alumni [LUT](#) / [LAB](#)

[Company cooperation in studies and recruiting](#)

7. Information systems employed

LUT Universities' stakeholder information is maintained in the Dynamics 365 CRM stakeholder management system. The CRM system is integrated with certain other systems, such as the event registration system used by LUT Universities and the user management system maintained by IT management. In addition, newsletter and survey tools, for example, are used to maintain stakeholder relations.

8. Data sources

Personal data is often collected from the data subjects themselves. Personal data may be obtained from the data subject, for example, when registering for events organised by LUT Universities or through forms on the LUT Universities' websites. Such forms include, for example, various contact forms and forms that the data subject can use to subscribe to newsletters or information packages. The data subject may also provide LUT Universities with their personal data in connection with various events, such as fairs.

Personal data is also obtained from public sources, such as the websites of companies or organisations.

Profinder is used to obtain information on the decision-makers of organisations.

The information stored in the CRM system is also updated manually by the users in connection with customer meetings or other contacts.

The personal data of LUT Universities' employees is obtained through the user management system maintained by the IT department.

With the consent of the data subject, alumni data is imported into the CRM system from the student information system, if the data is not obtained from the data subject.

The data of the participants in the continuing education can also be obtained from the data subject's employer instead of the data subject themselves. With regard to direct marketing of continuing education, data is collected from companies' public websites, company registers (commercial actors) or catalogues or address lists of fair and event organisers.

9. Use of cookies

Cookies are used in browser-based information systems for the processing of personal data. A cookie is a small text file that the browser saves on the user's device. Cookies are used to implement the services, to facilitate logging in to the services and to enable compilation of

statistics on the use of the services. The user can block the use of cookies in their browser, but this may prevent the system from working properly.

Cookies are used in the processing of personal data in browser-based systems.

10. Data transfer and disclosure

Personal data may be processed by both LUT and LAB staff, if necessary. The processing of personal data by both higher education institutions may be necessary, for example, because the same data subject has a stakeholder relationship with both higher education institutions or because the staff of both higher education institutions are involved in the provision of services.

Data is also transferred to external service providers, i.e. processors of personal data, in accordance with agreements made with them. The CRM system operates on an external service provider's server, and the service provider acts as a processor of personal data. Other external service providers involved in the processing of personal data may include, for example, newsletter, survey and registration tools.

Profinder is used to retrieve and update the information of the organizations. Organizations' and their contact persons' information is transferred to Profinder for this purpose.

11. Transfer or disclosure of data outside the EU or the European Economic Area

The personal data is processed primarily within the European Economic Area. However, in certain situations, the personal data may also be processed in the United States of America or other countries outside the EEA where the CRM system service provider or its subcontractors operate. In such case, the transfer of personal data is based on standard contractual clauses adopted by the Commission or on the EU-U.S. Data Privacy Framework.

Personal data may also be transferred outside the EEA in connection with the use of other external service providers, such as newsletter tools. In such case, the transfer of personal data is carried out using a protection mechanism in accordance with the General Data Protection Regulation, such as a Commission decision on an adequate level of protection for personal data or standard contractual clauses adopted by the Commission.

12. Safeguards for data processing

Only those who need the information due to their job description have rights to the Dynamics 365 system. The CRM system used is located on the service provider's cloud server, the information security of which has been adequately ensured by external service providers in accordance with the agreements.

The maintenance of the data is protected by an AD ID and password. The data stored in the system is available to a group limited by user rights. The Dynamics 365 CRM system is only available on the internal network and via remote connection.

The database is protected with the server's user and password credentials.

13. Automated decision-making

No automated decision-making is carried out in the processing of personal data.

14. Rights of the data subject

Data subjects have the right to withdraw their consent if the processing of personal data is based on consent.

Data subjects have the right to lodge a complaint with the Office of the Data Protection Ombudsman if the data subject considers that the processing of personal data concerning them has violated the applicable data protection legislation. The contact details of the Office of the Data Protection Ombudsman are available on the website of the Office of the Data Protection Ombudsman: <https://tietosuoja.fi/>

Data subjects have the following rights under the EU General Data Protection Regulation:

- a) Right of access to data concerning the data subject (Article 15).
- b) Right to rectification of data (Article 16).
- c) Right to erasure of data (Article 17).
- d) Right to restriction of processing (Article 18).
- e) Right to data portability to another controller (Article 20).

If the processing of personal data is based on the performance of a task carried out in the public interest, the exercise of official authority vested in the controller, or the pursuit of the legitimate interests of the controller or a third party, the data subjects also have the right to object to the processing of their personal data (Article 21 of the General Data Protection Regulation).

The above-mentioned rights of the data subject do not necessarily apply to all situations, but their applicability depends, for example, on the legal basis for processing personal data.

The contact person in matters related to the rights of the data subject is the Data Protection Officer, whose contact details are provided in section 3.

15. Updating the Privacy Notice

This Privacy Notice may be updated, in which case the date of the update will be recorded at the beginning of the Privacy Notice.