



## PRIVACY STATEMENT

EU GENERAL DATA PROTECTION REGULATION 2016/679 (GDPR)

1. Name of the register **Working life feedback for upper secondary vocational education and training**

2. Controller Finnish National Agency for Education  
Address P.O. Box 380, 00531 Helsinki (Hakaniemenranta 6), 00530 Helsinki  
Telephone +358 29 533 1000 (switchboard)  
Email kirjaamo@oph.fi

3. Controller's representative

Name Riikka Vacker  
Address Finnish National Agency for Education, Vocational education and training,  
P.O.Box 380 (Hakaniemenranta 6), 00531 Helsinki  
Telephone +358 29 533 1000 (switchboard)  
Email kirjaamo@oph.fi

Data Protection Officer's contact information

Name Jyrki Tuohela  
Telephone +358 29 533 1000 (switchboard)  
Email tietosuoja@oph.fi

4. Legal basis and purpose of processing personal data

Upholding the register is based on section 32g of the Act on the Financing of Education and Culture 532/2017 and the Ministry of Education and Culture decree on the Calculation Criteria of Funding for Vocational Education and Training 1244/2020, which contains provisions on the target groups for working life feedback, the collection of feedback and the use of feedback data in the calculation of funding.

The purpose of the register is to produce information to support the development and quality monitoring of vocational education and training and to justify the funding of vocational education and training as part of the education provider's impact funding.

The Arvo – Education Management Information Service is used to collect feedback on working life in upper secondary vocational education and training. The system maintains feedback surveys that are used to collect the opinions of responsible workplace instructors and workplace representatives on the activities and services of the education provider in relation to training provided during apprenticeships and training agreements. The feedback is given anonymously.  
Respondents' personal data is not stored in the Arvo system.

Employee users are identified when they log in to the system. Identification is carried out through the Finnish National Agency of Education's licensing service included in the learner's service package, which is the Agency's centralized register service.

Employee information is used for providing information and communications related to upholding the register. Employees' personal identity codes are collected for the purpose of identifying the employees.

## 5. User management employee register data content:

- preferred name
- service language
- personal identity code
- OID learner number (unique identifier generated automatically by the program)
- user ID
- (work) organization
- job title
- In addition, the user management service contains information on user rights (role that restricts which data the user may process and the organization whose data they may process) and the validity period of the user authorization.

The information content of the employee register has also been saved in the feedback survey system, with the exception of service language and job title.

## 6. Sources of personal data

The personal data entered in the register is obtained from the data subject or from a person representing the data subject's employer. The OID learner ID is obtained automatically from the Finnish National Agency for Education's learner ID register.

## 7. Disclosure of personal data

Personal data is not disclosed.

## 8. Data disclosure outside EU Member States or the EEA

Personal data is not disclosed.

## 9. Retention time of personal data

Information related to right of use is retained for the duration of the right of use. Personal data related to the learner ID is retained permanently.

## 10. Description of technical and organizational safeguards (article 32, section 1) Data protection

The data in Finnish National Agency for Education registers is protected by using information security methods as required by legislation. Personal data is protected against inappropriate access and unlawful processing (e.g. destruction, alteration or disclosure). Each employee can only handle data that they need in order to fulfill their duties.

## A. Manual materials

Documents are kept in a locked space away from third parties. Documents are printed only when necessary, and printed documents are destroyed after use.

## B. Electronically processed data

The data is protected by user rights that are based on the duties of each Finnish National Agency for Education employee, by changing passwords regularly and by using data transfer encryption software. Internal instructions have been drawn up on the use of the registers. Administrative controls are used to monitor and ensure the appropriateness of use. These controls secure adequate administration and use of security resources and the functionality of reporting processes. Access to the database requires identification, and access data is collected in the system log.

## 11. Right of inspection

The data subject has the right to inspect their data stored in a personal data register.

Employee users have access to their personal data when logged in to the Opintopolku.fi service (personal data). The data subject may also submit an inspection request in writing to the controller's representative. The inspection request should be addressed to the Finnish National Agency for Education, Hakaniemenranta 6, P.O. Box 380, 00531 Helsinki. The request should include information necessary for finding the data (name and personal identity code). Printable form for inspection request: <https://opintopolku.fi/wp/wp-content/uploads/2018/05/rekisteritietojen-tarkastus-suomenkiel.pdf>

If the data subject has used their right to access their data in the past calendar year, the data controller can request a fee to cover the administrative costs of data retrieval (article 12 [5]).

## 12. Right to demand rectification of data

The data subject has the right to demand rectification of false or inaccurate data by the data controller without undue delay. The data subject can update their personal data at Opintopolku.fi by using strong identification. If this is not possible, the data subject can update their data by sending a written personal data notice to the Finnish National Agency for Education. Printable form for a rectification request: [Rectification form for register data](#). The request for rectification should be addressed to the contact person of the register: Finnish National Agency for Education, P.O. Box 380, 00531 Helsinki. In the rectification request, the data subject must include the information necessary for finding the data (name and personal identity code). The data subject must identify and justify which information they are requesting to be corrected, what they consider to be the correct information and how they wish to have the correction carried out. Requests sent by mail should be sent to the following address: Finnish National Agency for Education, Hakaniemenranta 6, P.O. Box 380, 00531 Helsinki. In the rectification request, the data subject must include the information necessary for finding the data. Requests sent by email should be sent to kirjaamo@oph.fi

## 13. Other rights related to the processing of personal data

The data subject has the rights defined in the General Data Protection Regulation to limit the processing of their data, such as the right to deny the use of their personal data for direct marketing or other similar use. A written requirement to restrict the processing of personal data must be submitted to the Finnish National Agency for Education.

The data subject has the right to lodge a complaint with the Data Protection Ombudsman concerning an alleged personal data processing violation.

## 14. Is the data used for automatic decision-making and/or profiling?

The information contained in the register is not used for profiling, and no automatic decision-making is targeted at the data.