

# Register and data protection statement

This is the register and data protection statement of the **Espoo Music Institute**. The statement follows the Personal Data Act (§§ 10 and 24) and the EU General Data Protection Regulation (GDPR). Composed **21.5.2018**. Latest amendment **25.5.2018**.

## 1. Controller of the data

Espoon musiikkiopiston kannatusyhdistys ry  
Espoo Music Institute Support Association  
Finnish Business ID 0200559-3

PL 6666  
02070 Espoon kaupunki (The City of Espoo)  
Finland

Visitations address:  
Kulttuurialue 2  
02100 Espoo  
Finland

Website: [www.emo.fi](http://www.emo.fi) / [www.ebeli.fi](http://www.ebeli.fi)

## 2. Contact person responsible:

Financial Manager Hanna Ahtiainen (personnel)  
[hanna.ahtiainen@emo.fi](mailto:hanna.ahtiainen@emo.fi) / tel. 010 4061485

Study Secretary Jaana Matilainen (EMO)  
[jaana.matilainen@emo.fi](mailto:jaana.matilainen@emo.fi) / tel. 010 4061484

Office Secretary Sonja Mälkki (Ebeli)  
[info@ebeli.info](mailto:info@ebeli.info) / tel 09 4550025

## 3. Name of the register

Person register of the institution, and study register of the students, their parents and the personnel.

## 4. Lawfulness and purpose of processing personal data

The data processing according to the EU General Data Protection Regulation is justified by the Act of Basic Education in the Arts (21.8.1998/633).

The register is maintained via the Eepos Institutional Management portal. Eepos Institutional Management is a system designed for basic education in the arts that is used to process data related to the students, their parents and teachers as well as organizational matters. Only the institution administration and teachers have access to the portal.

The purpose of processing personal data is to organize the teaching process. The register is used to manage the data necessary for and created during the organization of the teaching. The register contains data related to teaching, organizational matters and teaching results. The data will not be used for automated decision-making or profiling.

The administration of the institution processes all data resulting from teaching activities. The personal data of the student will only be processed in order to maintain the integrity of the register.

Teachers employed by the institution will only process the data of students directly related to their work. The teacher will not process detailed personal or address data of the students or their parents.

The purpose of processing the personnel data is to maintain employment relationship matters. The personnel register is managed via the Visma Payroll system.

## **5. Information content of the register**

Information content of the register includes: names, personal identification numbers and contact information of the students (phone number, e-mail address, home address), IP address of the internet connection, billing information, studies and study history, completed studies and certificates, class attendance, names, personal identification numbers and contact information of the parents (phone number, e-mail address, home address), consent for use of photo and video material, names, personal identification numbers and contact information of the teachers (phone number, e-mail address, home address), teaching work, classes held, statistics and number of relevant students, information about the employment relationship and salaries. Members of Executive Board and Support Association (name, phone number, home address, e-mail address) and participants of events coordinated by the controller. Contact information of the personnel, their employment relationships and salaries.

## **6. Regular sources of information**

Information content of the register is collected from the clients via www-forms at the time of enrollment, e-mail, phone conversations, client meetings and other events during which the client delivers their personal data. The information content of the personnel is collected directly from the members.

## **7. Regular disclosure of data and transfer of data outside of the EU or the European Economic Area**

Data concerning a private person will not be regularly disclosed to the third parties. Teaching-related statistics (number of students and amount of teaching, with no identification information involved) are regularly disclosed to the Finnish National Agency for Education and Statistics Finland, for example. The data may be published based on an agreement with the client.

The personal, employment relationship and salary data of the personnel will be disclosed to pension institutions, tax authorities, occupation injury insurance companies and trade unions.

Data will not be transferred outside the EU or EEA.

## **8. Data retention time**

The institution is obliged to permanently retain the data of the student register related to the studies and personal information of the student and their parents. Retention time requirements for all the registers, physical documents and their copies are set by the Act on Archiving (Arkistolaki 23.9.1994/831). By request of the data subject the data may be anonymized. The retention time allows one to temporarily interrupt and later resume their studies without the loss of study history data. The retention time also allows the issuing of a participating certificate for a student after the completion of a study programme. Due to pension regulations, the recommended retention time for the salary data is 50 years.

## **9. Principles of register protection**

The register is managed meticulously, and the data processed via information systems are appropriately protected. All sensitive personal data of the students, their parents and teachers are preserved under a strong encryption in the databases and backup.

The browsing rights of the data are restricted by defining user-specific rights. Parts of the register may be printed out on demand or in need, and printouts containing names of the persons or case-specific information are handled according to confidentiality obligations. Information obtained via the register is stored with care and the persons that manage personal data are bound by confidentiality obligations.

The personal data of the employment relationship register may only be managed by designated persons. The data is protected by a username and a password. Manual data are stored in a locked space and in a locked safe. The health data of the employees are stored separately from their personal information.

When the register data are stored on Internet servers, the physical and digital safety of the equipment is properly managed. The controller of the register is responsible for ensuring that the critical data related to the information stored, the clearances and other security matters are processed confidentially and only by the designated persons. Proper care is also taken in relation to information security at the work stations.

The service provider processes personal data only to the extent to the participation of the service provision. The controller of the register obligates the provider to take care of an adequate level of information security in order to preserve personal data.

## **10. Rights of the data subject**

### **Right to inspect information**

The data subject has the right to obtain a confirmation from the controller of the register whether the respondent's personal information is being processed, and the right to inspect their personal data stored in the register. The respondent also has the right to obtain a copy of the personal data processed. The request for inspection must be sent to the controller (see Section 2). The request must be submitted in written form and it must be signed. The request for inspection may be denied on legal basis.

### **Right to rectification**

The controller may on their own terms or by request of the data subject (via contacting the persons stated in Section 2) correct, delete or complete the part of the register content that is erroneous, irrelevant, vague or outdated in terms of processing. The data subject also holds the right to demand the controller to withhold the data processing, for example while waiting for the controller's response to the data subject's request for rectification or deletion of the data.

### **Right to restriction of processing**

The data subject has the right to obtain from the controller restriction of processing of personal data of the subject that is processed based on the purposes of the legitimate interest of the controller of the register. The data subject has the right to object to the processing and disclosure of data concerning the subject for purposes other than that of teaching via notifying the controller, according to Section 2.

### **Right to withdraw consent**

In case the data processing is based on the data subject's consent, the data subject has the right to withdraw the consent by notifying the controller of the register according to Section 2.

### **Right to transmit data from the one system to the other**

The data subject shall have the right to receive the personal data concerning the data subject, which the data subject has provided to a controller in order to fulfil the contract between the parties, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, if it is technically possible.

**Right to lodge a complaint with supervisory authorities**

The data subject has the right to lodge a complaint with a competent supervisory authority in case the controller of the register has not complied or acted accordingly to the data protection regulation.

**11. Other personal data processing rights**

The data subject has the right to submit a request to erase the data that concerns the subject from the register (right to be forgotten). The data subject also holds the other rights stated in the EU General Data Protection Regulation that include the right to restriction of processing related to certain situations. The request must be submitted to the controller in written form. The controller of the register may demand the person submitting the request to verify their identity. The controller of the register shall respond to the client within the time limits stated in the EU General Data Protection Regulation (typically within one month).