



VISU7-004 Privacy Statement

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Change history

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1.0	16.1.2026	Janne Suokas Samuli Malinen	Rewieved

Controller

University of Oulu

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Representative of the controller

Person responsible for the processing operation

Chief Information Officer

- Implementation and maintenance of the secure user environment

Person responsible for the register:

Chief Information Officer

- User and personnel data

Data Protection Officer

If necessary, you can contact our Data Protection Officer: dpo@oulu.fi

Kommentoinut [SH1]: Oikea sposti osoite!

Purpose of processing personal data and legal basis for processing

Data material based on a data permit under the Act on the Secondary Use of Health and Social Data is always disclosed to the permit holder for processing in a secure operating environment as defined in Section 20 of the Act on Secondary Use, unless it has been converted into aggregated statistical data.

The University of Oulu (UO) has established a secure operating environment in accordance with the Act on Secondary Use ("the environment"), where permit holders can process data materials. Personal data contained in the data materials are processed in the environment for the purpose

specified in each data permit, typically for scientific research. Personal data of the processors specified in the data permit and of UO personnel are processed for managing user accounts, enabling the processing of data materials, and supervising such processing.

The environment complies with the regulation of the Social and Health Data Permit Authority (Findata), "Requirements for secure operating environments of other service providers" (1/2022, Ref. THL/214/14.00.07/2022).

The environment may also be used for processing data that is not based on a data permit under the Act on Secondary Use. In such cases, the processing of data containing personal data is based, case by case, on legislation other than the Act on Secondary Use and any related authorization procedures. Use of the environment is always based on an order and an order confirmation that includes the terms of use of the environment.

Personal data contained in the register and categories of data subjects

The environment processes:

1. Personal data of the target group contained in data materials subject to a data permit under the Act on Secondary Use or other legislation or possible authorization procedures
 - These personal data may include data of minors or other vulnerable individuals
2. Data of permit holders and persons authorized to process data materials subject to a data permit or other authorization ("users") ("user data")
3. Data of UO personnel

Personal data processed:

1. Social and health data of the target group contained in data materials subject to a data permit under the Act on Secondary Use or other legislation or possible authorization procedures
 - a. These personal data include special categories of personal data and personal identity codes

2. User data

- a. Name
- b. Username
- c. Contact details
- d. Login information and usage times
- e. Network identification data

3. Data of UO personnel

- a. Names of environment administrators
- b. Login information and usage times
- c. Network identification data

Roles and responsibilities

User and personnel data:

- UO acts as the controller for user and UO personnel data. ICT Services processes this personal data within the environment.

Data materials subject to a data permit and other data materials:

- The controllership of data materials subject to a data permit is defined in accordance with the data permit.
- UO acts as a processor in accordance with data protection legislation when the controller of the data materials subject to the permit is an entity other than UO.
- The environment may also be used to process data materials for which UO acts as the controller.

When personal data is processed for managing user accounts, providing the environment, enabling the processing of data materials, and supervising the processing, the persons carrying out the processing are employed by UO. The processing is primarily carried out by UO ICT Services personnel; however, UO data protection personnel have the right to process user and log data when performing usage monitoring.

Data sources

Social and health data originate from registers referred to in the Act on Secondary Use within the limits permitted by each data permit, or from other sources if the environment is used for purposes outside the Act on Secondary Use or if data from other registers are combined with data materials subject to a data permit.

The source of user data, with regard to the person's name and contact details, is the order form for the environment submitted to UO by the user's representative ("subscriber"). Other user and personnel data are generated when users and personnel use the environment.

Disclosure of personal data to third parties

Personal data are not routinely disclosed to other recipients. Users of the environment cannot independently transfer personal data to another processing environment; this always requires an amendment to the data permit. User data are not disclosed to other recipients and are processed solely for tasks related to the maintenance and administration of the environment at UO.

Transfer of personal data outside the EU or EEA or to an international organization

Data are processed for maintaining the environment and providing the service exclusively within Finland from a geographical perspective. An exception is the information stored in the service management system (personal data provided on the order form and its attachments), which is stored in a cloud-based database located within the EU/EEA.

If permitted by the data permit, users may also process data materials remotely from outside the European Economic Area (EEA). In such cases, the controller of the data materials subject to the data permit is responsible for the legal basis for the transfer and for the safeguards required under data protection legislation for transferring personal data.

Retention periods for personal data

Social and health data are retained in the environment for the duration of the data permit and are deleted no later than six months after the permit expires. Usage log data are deleted 12 years after

the expiration of the data permit. Access rights data are deleted 12 years after the termination of the access rights.

Right to access one's own data

A person recorded in the register has the right to check what personal data concerning them have been recorded or to verify that no data concerning them exist in the register. The data subject may request access to their personal data from the controller. A user or a representative of the University of Oulu personnel may submit a request to the UO registry office to exercise their rights. Contact details: kirjaamo@oulu.fi

Kommentoinut [SH2]: Oikeat yhteystiedot/linkki

Right to rectification

The data subject has the right to require the controller to rectify inaccurate and incorrect personal data concerning them without undue delay. User and personnel data are maintained as part of the normal administrative processing procedures. Therefore, not all corrections are based on the data protection regulation but may be routine updates related to managing the customer relationship. However, if the data subject identifies an error in their data, they may also request rectification under the data protection regulation. Such a request shall be submitted via the registry office to UO ICT Services for processing.

Right to restriction of processing

The data subject has the right to obtain from the controller restriction of processing where the accuracy of the personal data is contested. In such cases, processing shall be restricted until the controller can verify the accuracy of the data. If the data subject wishes to restrict the processing of their personal data, this right does not extend to processing necessary for compliance with a legal obligation or for the performance of a contract (order). In practice, this means that, for example, the management of access rights and the processing of log data cannot be restricted by the data subject. On the same grounds, a UO employee cannot restrict the processing of their data. A user cannot restrict the retention of their personal data.

Right to lodge a complaint with a supervisory authority

If the data subject considers that the processing of personal data concerning them violates the applicable legislation, they have the right to lodge a complaint with a supervisory authority (the Office of the Data Protection Ombudsman). Contact details: [Tietosuojaja yhteystiedot](#)