

**DATA PROTECTION POLICY**

Based on the EU General Data Protection Regulation

Created 28.1.2026

**1. Controller of the register**

Lapland University of Applied Sciences  
Jokiväylä 11 C  
96300 Rovaniemi

**2. Representative of the controller**

Ari Konu, Director of Administration  
firstname.lastname@ulapland.fi

**3. Contact persons in matters related to the register**

Maija Törmänen, University Social Worker (administrator)  
firstname.lastname@ulapland.fi

Sonja Komulainen, University Social Worker (administrator)  
firstname.lastname@ulapland.fi

**4. Contact information of the data protection officer**

Jari Rantala, Data Protection Officer  
Legal Services  
+358 40 547 2583  
firstname.lastname@ulapland.fi

**5. Purpose of personal data processing**

University Social Workers' and study psychologist's services are part of the university's well-being services. The purpose of the well-being services is to advance students' studies, well-being and coping. Personal data and client documents are processed to maintain the social workers' and psychologist's client relationships.

As social welfare specialists, the University Social Workers are obligated to abide by the following Acts in their work:

- Act on the Status and Rights of Social Welfare Clients (812/2000)
- Act on social welfare client documentation (254/2015, no existing English translation)

**PROTECTION POLICY**

Based on the EU General Data Protection Regulation  
2 (6)

As social welfare specialists, psychologists are obligated to abide by the following Acts in their work focusing on the individual:

- Act on Health Care Professionals (559/1994)
- Act on the Status and Rights of Patients (785/1992)
- Decree on patient documents (24/2022)

According to these Acts, it is in the interest of the client to maintain a client register and to record information about meetings. In addition, the contact details and anonymous statistical data stored in the register are used for quality assurance and development of higher education student welfare services.

In accordance with legislation regulating the operation of the controller, Lapland University of Applied Sciences does not function as a social welfare service or a health care unit. Therefore, documents created in individual counselling are not regarded as patient documentation. The operation of the university is guided by obligations provided in the Universities of Applied Sciences Act (932/2014) and other related legislation. The University Social Workers and study psychologist's description requires the processing of sensitive information. The basis for processing information produced in counselling is the performance of a task carried out in the public interest (GDPR Art. 6, 1e).

**6. Legal basis for processing personal data**

The processing is necessary to carry out a task in the public interest or to exercise official authority vested in the controller.

The EU General Data Protection Regulation (2016/679), Article 6 e

The well-being services also process sensitive information concerning, for example, the client's health, and the specific grounds for the processing are as follows:

- the data subject's consent
- performing a task in the public interest or exercising official authority vested in the controller

The EU General Data Protection Regulation (2016/679), Article 9 a and g

**7. Processed personal data groups and the data storage period**

The register contains the following information:

- the client's personal data: names, social security number and sex, contact information, native language, other language and nationality
- study right information: name of the educational institution, the degree programme and information on special study arrangements that potentially apply

**PROTECTION POLICY**

Based on the EU General Data Protection Regulation  
3 (6)

- previous and current parties of collaboration: according to the student's report the following: university actors, mental health services, student health care, third-sector actors, etc.
- client report: the party that made contact, reason for becoming a client, meetings, discussions, consultations, and persons present, plans (e.g. well-being and health plan), recommended measures, summaries, statements, referrals, examination results and assessment
- document exchange: document forwarding (the employee who made the entry, date, the client's consent, document name, target, grounds for the forwarding (context, the client's request, statutory)) and received documents (date of receipt, source)

Based on client visits, the information is entered into the AJAS - Client Information System, whereby a client document is created. Information generated in the individual guidance sessions provided by the University Social Workers and the study psychologist are stored for four years, after which they are erased from the register.

**8. Data systems used in processing**

AJAS – University Social Workers' and Study Psychologist's Client Information System

**9. What is the source of the personal data needed in processing? Is the data subject obligated to deliver the needed personal data? Consequences if the data subject does not deliver the needed personal data**

The personal data needed in processing are received from the data subjects themselves. With the client's consent, the needed data may also be obtained from collaborators (university's well-being and counselling services, student health care, mental health services, third-sector actors etc.).

**10. Use of cookies**

Cookies are applied in browser-based data systems used for processing personal data. Cookies are small text files that the browser stores on the user's device to implement services, to facilitate service logins and to enable archiving of service use. Users can block cookies on their browser, but this may prevent the proper operation of the system.

Cookies are used in personal data processing as follows:

- Yes, browser-based systems
- No

**11. Regular data transfers and forwarding**

**PROTECTION POLICY**

Based on the EU General Data Protection Regulation  
4 (6)

The personal data stored in the register are secret, and they are not forwarded on a regular basis. The right to forward secret data is primarily based on the client's consent. Statistical data without personal identifiers can be produced from the register for the use of Lapland University of Applied Sciences.

No personal data are forwarded to direct marketing.

**University Social Work services:**

Secret data can only be forwarded with the data subject's express consent or if there is a specific provision on forwarding or on the right of access to the data in an Act (Chapter 7 of the Act on the Openness of Government Activities 621/1999 and section 18 of the Act on the Status and Rights of Social Welfare Clients 812/2000).

Statistical data without personal identifiers can be produced from the register for the use of Lapland University of Applied Sciences.

**The right to deviate from secrecy obligations** (section 18 of the Act on the Status and Rights of Social Welfare Clients)

It is possible to deviate from the secrecy obligations concerning social welfare as provided in Chapter 7 of the Act on the Openness of Government Activities, unless otherwise provided in this or another Act.

A person performing tasks referred to in this Act has the right, notwithstanding the secrecy obligation, to provide the police with information necessary for assessing a threat to life or health and for preventing a threatening act if the person, when performing the tasks, has received information on circumstances based on which he/she has reason to suspect that someone is in danger of becoming victim to violence.

**Study psychologist services:**

Secret data created in using study psychologist services may be forwarded with the client's consent to an authority with a statutory right of access to the data at the authority's written request which states the Act on which the right of access is based. Access to data may be granted without the client's consent if data forwarding or the right of access to data is specifically provided in an Act.

**12. Transferring or forwarding data outside the EU or EEA and grounds for it**

No student information is transferred outside the EU or the European Economic Area.

**13. Personal data protection principles**

The server administrator used by the Data Controller and the Data Processor in accordance with the GDPR is Ajas Oy.

AJAS is certified as a Class A1 patient information system. During the certification process, its information security practices were verified by an external auditing company.

**PROTECTION POLICY**

Based on the EU General Data Protection Regulation  
5 (6)

The online service used for processing registry data is protected with passwords, and the server as well as other servers are secured with firewalls, passwords, and other technical safeguards. Passwords are not stored on the server in plain text; instead, they are kept salted and encrypted using a method that is considered secure at any given time. The server is located in a locked and monitored facility in Upcloud Oy's data center in Helsinki. Data retention is ensured through automatic backups.

The personnel of Ajas Oy are bound by confidentiality, and each employee has signed a nondisclosure agreement committing them not to disclose any information related to client data.

The storage, archiving, erasure and other processing of the information possessed by the Lapland University of Applied Sciences are guided by a data management plan and data secrecy and data protection instructions. The register has been protected from external parties with firewalls and other technological solutions. The connections between the register and user workstations have been protected. Using the system requires a personal username and password.

Employees can only process the personal data that they need in performing their tasks. The right of access to the system expires when a person's employment relationship ends or the person leaves the tasks for which the right of access has been granted. Employees processing the data are bound by a non-disclosure obligation that continues after the end of the employment relationship.

The system users engaged in client work (university social workers and study psychologist) are in charge of processing the data of their own clients. Within the framework of substitute arrangements, university social workers are granted access to client information of other social workers. University social workers do not have access to the student psychologist's client information, nor do the student psychologist have access to the client information held by the social workers.

The system registers faulty logins and all data processing and accessing performed in the system. Data protection and the confidentiality, integrity and usability of personal data in the client register are ensured through appropriate technical and administrative measures.

**14. Automated decision making**

No automated decisions are made in the processing.

**15. Rights of the data subjects**

The data subjects have the following rights:

- obtaining information on the processing of their personal data, unless otherwise provided in law
- examining the data
- rectifying or erasing the data
- restricting the processing of the data
- not becoming subject to automated decision making without a legal basis

**PROTECTION POLICY**

Based on the EU General Data Protection Regulation  
6 (6)

As regards rectifying or restricting access to the data, it is up to the data subject to report the issue. The contact person in issues related to the rights of the data subject is the data protection officer, whose contact information is at the beginning of this document.

Data subjects are entitled to request access to their information as follows:

**Attending students:**

Attending students may request their social worker or study psychologist to inform them of the entries stored in the system during counselling. The data can also be delivered as a client printout of the register entries.

**When the study right has expired:**

Data examination, rectification and erasure requests may be sent to the controller through forms available at <https://lapinamk.fi/en/lapland-uas/data-protection/>

Data subjects are entitled to file a complaint with the Office of the Data Protection Ombudsman if the effective data protection legislation has been violated in the processing of their personal data. Contact information: Tietosuojavaltuutetun toimisto, PL 800, 00521 Helsinki. Email: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Advice and instructions on the rights of the data subject are given by the data protection officer, whose contact information is in section 4.