

PRIVACY NOTICE

According to the EU General Data Protection Regulation GDPR (EU 679/2016), Art. 13-14

The notice concerns: The Cultural Sciences Archive Cultura's processing of customers' personal data

Data controller

Åbo Akademi University
Tuomiokirkontori 3
20500 Turku
Finland

Åbo Akademi University is controller for the personal data collected and processed in the university's activities – in teaching, guidance, research, administration, and cooperation, internally and externally.

Responsible unit for the processing that is described in this document:
The Faculty of Human and Social Sciences; Department of Humanities

Contact person:

Contact person: Fredrik Nilsson, cultura@abo.fi, +3585053033884

Data Protection Officer at Åbo Akademi University: dataskydd@abo.fi, +358 2 215 31 (switchboard).

For what purpose do you use the personal data?

Overall purpose:

- Description of system or tool

The fundamental purpose of the archive is to preserve and make available archival materials for scientific and historical research. When you as a customer contact us with an enquiry we process your personal data until your inquiry is resolved, whereafter the information is stored for a limited period (10 years). Furthermore, the archive collects, processes and stores customer's personal data through paper forms, when the customer inquiry results in a visit to the archive and includes handling of the materials.

What is the legal basis for processing personal data?

According to GDPR there must always be a legal basis for processing personal data. The legal basis for processing your personal data is:

Public interest or official authority (Art. 6 1 e)

Åbo Akademi University has statutory tasks of public interest and the right to exercise official authority according to the Universities Act. Scientific and historical research is an example of a statutory task of public interest.

Cultura archives, preserves and makes available to researchers and the general public materials for scientific and historical research. Your personal data is being processed in the archive's customer service, which is one of the core functions of the archive. Depending on the type of inquiry the archival personnel may ask you to provide additional information about yourself, in order to e.g. ensure that you have a legitimate reason to access archive materials containing personal data.

Sensitive personal data may be included in the processing if the customer is in contact with the archive in their capacity as a representative or member of an organization with a political or religious affiliation, and this information is a relevant part of the motivation for providing access to materials containing sensitive personal data; or information about sexuality may be included if the customer discloses their relationship to a person that the archival inquiry pertains to. Customer's personal data of this kind is never disclosed to other researchers, and is destroyed at the end of the 10-year storage period. The archive assumes that a customer who provides such information consents to its processing. (GDPR Art. 9a).

Which personal data is processed and by whom?

Name, contact details (generally phone number or e-mail), marital status or other family ties, occupation, role in organization, the contents and purpose of the inquiry.

The data is processed by the archival personnel, as needed by other ÅAU personnel (legal&compliance, IT), data processors contracted by ÅAU (in special cases the collection management database Collection Pro; other parties hired as needed by IT).

User rights are defined and updated based on task-related usage needs.

From where do you collect personal data and how is the data processed?

The personal data is collected from the customer when they contact the archive. Archival inquiries are received through phone, e-mail and the feedback function of the national Finna-portal, which is connected to the archive's e-mail. If you do not wish to have your e-mail address registered by the Finna-portal you are always welcome to contact the archive directly.

The archive may if needed ask for additional information about customers, i.e. to ensure that you have a legitimate purpose for accessing materials containing personal data. Disclosing this information is voluntary, but the archive reserves the right to decline to respond to inquiries lacking in context.

When a customer visits the archive and handles physical materials and/or accesses materials containing sensitive personal data, a customer agreement is made on paper.

For customer inquiries concerning the archive's informant or donor registers, the ÅAU archives' customer service guidelines require that the decision to grant access to the materials is documented. This documentation is archived permanently.

Customers' personal data is collected and stored in a separate register within ÅAU's secure IT environment. The register is used to ensure customer service quality, and may during the storage period be consulted if there is suspicion of activity not permitted by the archive's terms of service.

The customer data register is converted to anonymized statistics which are stored permanently for the organization's business needs.

Physical customer agreements are stored in locked spaces and handled following the same security principles that apply to the archive's donor register, with the exception that customer agreements under no circumstances may be made available to researchers.

How do you delete or archive the personal data?

Digital identifying personal data (name and contact details) are stored in the digital customer register for a limited 5-year period. Customer agreements done on paper in conjunction with archive visits are stored for 10 years. Documentation regarding customer access to information in the archive's informant or donor registers is archived permanently if the archival inquiry is intended to result in a publication (i.e. if the customer is a researcher, author or journalist). Documentation of other customer inquiries to these registers is anonymized after a 10-year storage period. The data is necessary for conducting normal operations of the archive and ensuring good customer service, and the storage periods reflect the nature of the business and the needs of the archiving function.

Is personal data transferred for processing outside Åbo Akademi University?

No, personal data will not be transferred for processing outside Åbo Akademi University.

Is the personal data transferred outside Åbo Akademi University for the needs of a third party?

No, personal data will not be transferred outside Åbo Akademi University.

Is personal data transferred outside EU/EEA?

No, personal data is not transferred outside EU/EEA.

Additional information about a long-term or persistent register, system, or tool:

Principles for how the data/register is protected:

The customer data register in its entirety maintained only digitally and stored and processed within ÅAU:s secure IT environment.

Physical customer agreements are stored in locked spaces and handled following the same security principles that apply to the archive's donor register.

The archive's e-mail server and the work phones of archival personnel are handled, and information from them is removed, according to ÅAU-internal guidelines.

List of regular data sources (national registers, etc.):

Internal customers (ÅAU-affiliated researchers) may in some cases be granted access to materials through the collection management database CollectionPro. In such cases CollectionPro logs the user activity, and the archival personnel and system administrators (ÅAU IT) may consult the logs if misuse of the system is suspected.

Principles and regulations for storage and storage time:

Digital identifying personal data (name and contact details) are stored in the digital customer register for a limited 5-year period. Customer agreements done on paper in conjunction with archive visits are stored for 10 years. Documentation regarding customer access to information in the archive's informant or donor registers is archived permanently if the archival inquiry is intended to result in a publication (i.e. if the customer is a researcher, author or journalist). Documentation of other customer inquiries to these registers is anonymized after a 10-year storage period. The data is necessary for conducting normal operations of the archive and ensuring good customer service, and the storage periods reflect the nature of the business and the needs of the archiving function.

The personal data is only used for the archival organization's own purposes and is never made available to other customers.

Detailed information on automated decision-making:

The archival processing and preservation do not entail any automated decision-making.

What rights do you have when Åbo Akademi University processes your personal data?

Åbo Akademi University is responsible for taking appropriate technical and organizational measures to protect personal data against unauthorized or illegal processing and against damage to or loss of personal data. Personal data must always be processed in a fair and transparent manner in accordance with applicable data protection regulations

According to the EU General Data Protection Regulation GDPR, you have the right to

- get transparent information on how your personal data is processed and how you can exercise your rights (Art. 12)
- get access to your personal data at Åbo Akademi University and information on the processing of data (Art. 15)
- have your personal data corrected (Art. 16). *Note that employees and students at Åbo Akademi University can in most cases correct their own data according to the instructions on the intranet.*
- have your data erased ("the right to be forgotten") in certain situations (Art. 17)
- restrict the processing of your personal data in certain situations (Art. 18)
- have your personal data transferred between systems in certain situations (Art. 20)
- object to the processing of your personal data in certain situations (Art. 21)
- not be subject to automated decision-making, with certain exceptions (Art. 22)

You have also the right to be informed of a personal data breach involving a high risk for your personal data (Art. 34).

When the purpose of the processing is scientific research, statistics or archival purposes, the rights may be restricted by the Data Protection Act (1050/2018). Restrictions on rights always require special protective measures.

If you have questions about your rights, you can contact the responsible contact person (see above) or the ÅAU Data Protection Officer (dataskydd@abo.fi). See also the overall information on the processing of personal data on the ÅAU website (www.abo.fi/en/processing-of-personal-data-at-abo-akademi-university).

You have the right to lodge a complaint with the data protection authority if you believe that the processing of your personal data is an infringement of the General Data Protection Regulation (GDPR).

Contact information to the data protection authority:

Office of the Data Protection Ombudsman
PL 800
00531 Helsinki
+358 29 566 6700 (switchboard)
tietosuoja@om.fi
tietosuoja.fi