



Privacy Notice: processing the personal data of library patrons

This is a privacy notice, which is based on articles 13 and 14 of EU's General Data Protection Regulation.

Controller

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Person in charge and contact persons

Marita Ahola, Head of Information Services

Contact information of the Data Protection Officer

Harri Kilpiö, Data Protection Officer (Turku UAS), +358 50 598 5830

Please contact in all data protection related matters: tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing personal data

The personal data is used for managing the library's patron relations and the duties assigned to the Library and Information Services.

In the Library Services, personal data can be utilized e.g. for the following purposes: management of borrowing services, maintenance of patron data, customer service, managing patron relations, patron communications, access control of the self-service library, interlibrary loan services and statistics. The statistics do not contain personal data.

Legal basis for processing personal data

Processing personal data in the Alma library system is based on

- Borrowing services and access control (Article 6, Section 1b: performance of a contract made with the data subject)
- Transferring and updating the patron data of Turku UAS's staff and students (Article 6, 1f: Legitimate interests pursued by the data controller or a third party.)

Personal data is also processed in Turku UAS' electronic service channel; hence, the legal basis may change on a case-by-case basis.

Legitimate interests of the data controller or third party

The legitimate interest of Turku UAS' library is based on the opportunity to provide and develop the library services described in the purpose of the processing.

Students' data is transferred in advance to the library system from the student records to wait for the activation of the library patron relationship. This has been found a sensible and economic way of carrying out the library's duties.

The staff members' data is updated in the library system from the HR system. This helps keeping the staff members' data up to date.

Processed categories and storage times of personal data

The personal data of the staff and students of Turku UAS and external patrons is processed in the activities of the Library and Information Services.

The library system's patron data file contains

- the patron's identifying data (name, postal address, telephone number, email address, social security number and/or date of birth, the eduPersonPrincipalName (ePPN) of Turku UAS' staff and students, library card number)
 - information related to the library patron relationship (incl. current loans and reservations, loan history, information on fees and procedures related to any failure to return loans, notifications, sent messages, information on the
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dates and times of patron events, period of validity of the patron relationship)

- statistical data (patron and statistics group)

Patron-specific information related to borrowing, payments and maintenance of patron data is removed after two years of the event.

The data of patrons, excluding the staff of Turku UAS' library and the libraries with which Turku UAS has entered into an agreement, will be automatically removed from the register if the patron has not borrowed anything in over three years and the patron has no unreturned loans or unpaid fees.

Information transferred and updated to the library system from other systems

The name, social security number, postal address, telephone number, email address, ePPN, patron and statistics group and date of graduation are sent and updated from the student records of Turku UAS to the patron data file of the library. The transfer and updating of the data ends upon the termination of the right to study.

Any information on the students received from the student records is automatically removed after one year of the student's graduation, if the student has not registered as a library patron within that period of time.

The name, date of birth, postal address, work email address, ePPN, patron and statistics group and the end date of the employment relationship of those who have registered in the library's patron register and are in a full-time employment relationship are updated in the library's patron register from Turku UAS' HR system. Updating the information ends upon the termination of the employment relationship.

The data processed in other systems

Information related to invoicing unreturned material is stored in Turku UAS' systems for 10 years.



Personal data is removed in Turku UAS' electronic service channels annually or at regular intervals.

Regular information sources

Information provided by the patron, information received in connection with borrowing materials and the student records, HR system or other systems of Turku UAS.

Address information can be checked from public address and telephone number services or the Digital and Population Data Services Agency.

Receivers or receiver groups of personal data

Personal data is processed in Turku UAS' library system by library employees and employees in the libraries with whom a cooperation agreement has been drawn.

The supplier of the library system of Turku UAS, Ex Libris, can access the patron data file. An agreement has been made with the supplier on processing the personal data.

The customer interface of the library system is Turku UAS' Finna search service. The patron's data is transferred from the library system to the Finna customer interface, when the patron logs in Finna. ([Finna Privacy Notice](#).) In addition, data is transferred to the supplier of the online payment service Paytrail Plc when the patron makes payments in the Finna customer interface ([Privacy notices of Paytrail Plc](#).)

Data is also transferred to devices intended for patron use and required in producing library services, and the self-service library system.

The library staff processes personal data in Turku UAS' electronic service channels.



In invoicing and collecting debts for unreturned materials, personal data is disclosed to Turku University of Applied Sciences' Financial Administration and the debt collection agency utilized by Turku UAS.

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

The information is not disclosed outside the EU or EEA.

Principles of data protection

The data is accessed only by people whose tasks require access to the data. Access to the service is limited with user IDs and user rights. The staff is under an obligation of confidentiality.

The information in the patron data file is located on servers maintained by Ex Libris and Ex Libris is responsible for the information security of the server.

Data subjects' rights

According to the General Data Protection Regulation, the data subject has the right:

- to receive information on the processing of their personal data, unless otherwise regulated by the law
 - to request for access to their personal data and rectification regarding incorrect or insufficient information
 - to erase their data (not applied, if the basis for processing is compliance with a legal obligation or performance of a task carried out in the public interest)
 - to restrict the processing of their data
 - to object to the processing of their data, if the basis for processing is general or legitimate interest
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- to request the transfer of data they have submitted themselves from one controller to another, if the basis for processing is consent or agreement
- withdraw the consent they have given
- notification obligation of the controller on the rectification/erasure/restricting of processing of personal data
- not to be subject to automated decision-making (the data subject may allow automated decision-making by their consent)

Data subjects may exercise their rights by contacting the contact person mentioned in the privacy notice or the Data Protection Officer. More information on data subjects' rights is provided by the contact person and/or Data Protection Officer.

If processing the data does not require identifying the data subject without additional information or the controller cannot recognize the data subject, the right to inspection, rectification, data erasure, restriction of processing, obligation to report and transmittal is not applied.

You have the right to file a complaint with the Data Protection Ombudsman's office, if you consider that valid data protection legislation has been breached in processing your personal data. The contact details of the DPO can be found in the beginning of the privacy notice. All requests are processed on a case-by-case basis.
