



Privacy statement for student feedback and working life feedback on vocational education and training (VET)

EU General Data Protection Regulation 2016/679 (GDPR)

Name of personal data file

National student feedback and working life feedback on VET

Controller

Finnish National Agency for Education

Address: P.O. Box 380, FI-00531 Helsinki (visiting address Hakaniemenranta 6, FI-00530 Helsinki)

Other contact information: email opetushallitus@oph.fi and kirjaamo@oph.fi, switchboard +358 29 533 1000,

fax +358 29 533 1035.

Controller's representative (contact person)

Riikka Vacker, email: kirjaamo@oph.fi, switchboard +358 29 533 1000.

Data Protection Officer's contact details

Jyrki Tuohela, email: tietosuoja@oph.fi, switchboard +358 29 533 1000.

Purpose and legal basis of personal data processing

The data in the national register of student and working life feedback on VET is collected from responses received through feedback surveys sent to VET students, workplace instructors and workplace representatives. The responses describe the experiences that students and working life representatives have had of the provision of vocational upper secondary education. The data in the register is used in the monitoring, evaluation and development of quality and the production of statistical data in VET, and when granting funding for education and training to education providers in accordance with the Act on the financing of education and culture (1705/2009).

Student feedback and working life feedback are given anonymously. The register does not contain respondents' personal data.

The feedback data is collected through the Education Management Information Service Arvo. The officials using Arvo are identified when they log in to the system. Identification is carried out through the Access control service (Käytönhallintapalvelu) that is part of the Finnish National Agency for Education's Studyinfo services. It is the Agency's centralised user management register. Interface users' personal data (email address) is identified through the Organisation service of the Studyinfo service. The personal data of the officials are used for individualising the person and identifying the right to access the register as well as for communication that is part of keeping the register.

The use of the Arvo system also generates log data and user management data, based on which it may be possible to identify the user. The data can be used for monitoring the use of the data repository and for investigating disruptions.



Legal bases:

1) Student feedback on VET

Legal obligation (Article 6(1)(c) of the GDPR). The processing is based on the following legislation:

- Act on the financing of education and culture (532/2017), section 32 g
- Ministry of Education and Culture decree on the criteria for calculating funding for vocational education and training (1244/2020), chapter 3, including amendments (905/2021), section 20 and (926/2022), section 24 and 301/2025
- Act on vocational education and training (531/2017), section 127
- Act on the national registers of education records, qualifications and degrees (884/2017), section 4, subsection 2 and section 9, subsection 1, paragraph 5.

2) Working life feedback on VET (workplace instructor survey and workplace survey)

Legal obligation (Article 6(1)(c) of the GDPR). The processing is based on the following legislation:

- Act on the financing of education and culture (532/2017), section 32 g
- Ministry of Education and Culture decree on the criteria for calculating funding for vocational education and training (1244/2020), chapter 3, including amendments (905/2021), section 20 and (926/2022), section 24 and 301/2025
- Act on vocational education and training (531/2017), section 127
- Act on the national registers of education records, qualifications and degrees (884/2017), section 4, subsection 2 and section 9, subsection 4, paragraph 1 a.

Data content of the file / processed categories of personal data

Personal data group 1: Users who are officials at the Finnish National Agency for Education, the education provider or the IT provider maintaining the Arvo system. The Access control service (register of officials) includes the following information on user officials, which is used by the Arvo system: first name, language of service use, personal identity code, OID learner number (individualising identifier formed automatically by the programme), username, (work) organisation, job title, details of the authority to use (the role used to restrict what data can be processed and the organisation whose data can be processed) and the validity of the authority to use.

Personal data group 2: Users of the interfaces of student feedback and working life feedback on VET. The Access control service of Studyinfo (register of officials) contains the following information on user officials, which is also used by the Arvo system: first name, language of service use, personal identity code, OID learner number (individualising identifier formed automatically by the programme), username, (work) organisation, job title, details of the authority to use (the role used to restrict what data can be processed and the organisation whose data can be processed) and the validity of the authority to use, the interface user's email address (source of email address is the organisation data repository of the Finnish National Agency for Education), IP address calling the interface of the education provider (interface use), organisation (data combined from the access right of interface users of Arvo), the times and dates when the email address and IP address were recorded (created and updated).

Apart from the language of service use and the job title, the data content of the register of officials has also been recorded in the feedback survey system. The email address may be personal or the organisation's general one. The email information is required so that IP openings and updates in the Arvo system can be carried out for education providers and the codes required for use can be sent to education providers in secure mail. In addition, the email address is used in the investigation of fault and error situations and possibly in communicating with education providers about matters related to the interfaces.

The required log data on the use of the Arvo system are also collected.



Recipients or categories of recipients of personal data

Personal data will not be disclosed. The data that have been recorded through data collections but do not contain any personal data are disclosed to the Finnish National Agency for Education's statistical service Vipunen for reporting, and each education provider receives its own feedback data.

The Finnish National Agency for Education makes the decision on the disclosure of data from the data repository and is responsible for the lawfulness of the disclosure. The Agency may use the data repository to produce information packages that are required in the evaluation, research, development, statistics and other monitoring of education and training, as well as in guidance and financing.

Transfers of data to third countries and details of the protective measures used (including information on if the country in question has an adequate level of data protection) and ways of obtaining a copy or information about their content

No data are transferred to countries outside the EU or the EEA.

Storage period of personal data or, where giving this period is not possible, criteria for determining this period

In student feedback, the processing of personal data for collecting feedback began on 1 July 2018 and in working life feedback, on 1 July 2021. Personal data are processed in the Arvo system for as long as it is necessary for collecting the feedback. Data whose storage period has ended are deleted from the system on an annual basis. Personal data related to interface use will be deleted from the Arvo system if the provision of the service ends, however, in such a manner that the controller's own data are made available to the controller before they are deleted from the system. The storage period for log data is 5 years.

Data subject's rights

- Right to have access to personal data
- Right to rectify data
- Right to erase data
- Right to restrict processing
- Right to object
- Right to data portability.

Right to access data:

The data subject has the right to receive a confirmation from the controller stating that the data subject's personal data are or are not processed. On request, the controller must provide a copy of the personal data processed in the file.

The access request must be addressed in writing to the Finnish National Agency for Education at Finnish National Agency for Education, Hakaniemenranta 6, P.O. Box 380, 00531 Helsinki. In the access request, the data subject must provide the information needed to locate the data (Name and personal identity code). [Read and fill in the access request here \(in Finnish\).](#)

The data subjects themselves have access to the user official's personal data through the Access control service of Studyinfo. As for personal data other than those that the data subject has access to through the service, the data subject can submit an access request to a representative of the controller (see the previous section of this statement).



If less than one year has passed from the date on which the data subject last exercised their right to access, the controller may charge a fee based on the administrative costs incurred from providing the data (Article 12 [5]).

Right to rectification of data:

The data subject has the right to demand that the controller rectify without undue delay any inaccurate and incorrect personal data concerning them. The data subject must identify the data which they require to be corrected and which in their view are correct, indicate how they wish the data to be corrected, and justify their views.

A data subject who is an official can update their own information through the Access control service of Studyinfo or, if there is no access to the service, the data subject can update their own data by sending a written request for rectification to the controller.

Right to erase data:

When the processing of the personal data concerned is based on Article 6 (1c) (legal obligation) or (1e) (public interest, official authority), the data subject does not have a right to the erase the data (Article 17).

Right to object to processing of the data:

When the processing of the personal data concerned is based on Article 6 (1c) (legal obligation), the data subject does not have a right to object to the processing of their data.

Other rights related to processing the data subject's personal data:

The data subject has the rights referred to the General Data Protection Regulation, including the right to object to the controller processing data concerning them for direct advertising or other similar use. The data subject has the right to lodge a complaint about an alleged violation in the processing of personal data by complaining about the matter to the Data Protection Ombudsman. No data will be disclosed through the Arvo system for direct advertising, distant selling and other direct marketing, market research and opinion polls, or a public register and genealogical research.

If processing is based on consent as referred to in Article 6(1a) (or explicit consent as referred to in Article 9(2a)), the data subject must be informed of their right to withdraw consent at any time
The processing is based on the statutory task assigned to the Finnish National Agency for Education.

Right to lodge a complaint with the supervisory authority

The data subject has the right to lodge a complaint with the supervisory authority, especially in the Member State in which their permanent place of residence or workplace is located, or where the alleged breach of the General Data Protection Regulation has taken place.

Is the provision of personal data a statutory or contractual requirement or a precondition for concluding a contract, and is the data subject obliged to provide the personal data and any consequences of a failure to provide these data

The data related to the feedback systems for VET are recorded under the Act amending the Act on the financing of education and culture (532/2017), the Ministry of Education and Culture decree on the criteria for calculating funding for vocational education and training and the Act on vocational education and training (531/2017).



Information on where the personal data were obtained from and, if necessary, whether the data were obtained from publicly accessible sources

The data are obtained from the Access control service of Studyinfo and Organisation services and have been recorded by the officials using Arvo or the users of the interface themselves.

Information on whether automated decision-making is used, including profiling, and at least in these cases, relevant information on the logic of the processing as well as of the significance and potential consequences of this processing for the data subject

The data contained in the data file are not used for profiling and they are not subject to automated decision-making.