



# Ministry of Education and Culture Privacy Notice to Data Subjects

Personal data processed in EUROSTUDENT 9 surveys

## 1 General information

This privacy notice contains the information to be provided to data subjects (natural person) required under Articles 13 and 14 of the EU General Data Protection Regulation (EU) 679/2016. Data subjects are provided with this privacy notice when personal data is collected.

The EUROSTUDENT 9 survey brings together comparable data on the social background, living conditions, studies, international mobility and livelihood of higher education students. This privacy notice describes the processing of your personal data and your rights in the 2025 data collection process.

The data controller of the survey is the Ministry of Education and Culture. Commissioned by the Ministry of Education and Culture, Statistics Finland serves as the processor of personal data and is responsible for carrying out data collection in practice. The Finnish IT Centre for Science Ltd (CSC) is the processor of personal data with regard to students' contact details and the data to be extracted from the VIRTIA database.

## 2 Identity and contact details of the controller

Ministry of Education and Culture  
Postal address: PO Box 29, 00023 GOVERNMENT  
Email address: registry.okm(at)gov.fi  
Tel. +358 295 16001 (Government switchboard)  
Government distribution centre: Ritarikatu 2 B, Helsinki

## 3 Contact details of the data protection officer

Data protection officer of the Ministry of Education and Culture  
Email address: okmtietosuojaava(at)gov.fi  
Postal address: Ministry of Education and Culture, PO Box 29, FI-00023 GOVERNMENT

## 4 Purposes for processing personal data

Implementing the data collection of the EUROSTUDENT 9 survey by the EUROSTUDENT consortium. The data is used to narrow down the study population, to select the sample and to send survey invitations (student contact details). The response materials are supplemented with the register data listed in section 6 of this document. The data is processed in such a way that no individual respondents can be identified in the published results or the final dataset.

## 5 Basis for processing personal data

The processing of personal data is necessary for the purpose of data collection and is based on the Ministry's statutory duty to carry out the evaluation, development, planning and monitoring of the activities of higher education institutions. Key statutes on which the statutory duty is based are:

- Government Act 175/2003, section 2;
- Government Rules of Procedure 262/2003, sections 11 and 18;
- Government Decree on the Ministry of Education and Culture 310/2010, section 1;
- Universities Act 558/2009, section 51;
- Universities of Applied Sciences Act 932/2014, sections 45 and 65.

The processing of data in accordance with Article 6 of the EU General Data Protection Regulation is a legal obligation (6c) and necessary for the performance of a task carried out in the public interest for scientific research (6e).

Providing information by answering the questions is voluntary. Your data will be processed in an identifiable form only for as long as is essential for conducting the survey. At your request, further information about the processing of personal data in the survey project will be provided.

## 6 Categories of data subjects and categories of personal data to be processed

To implement the EUROSTUDENT survey, the personal data and educational data of students enrolled in a Bachelor's or Master's degree programme in the academic year of 2024-2025 at a university or a university of applied sciences are processed. The following categories of personal data are processed in the survey:

- Name and contact information, age, gender (registered), nationality and mother tongue.
- Education data on the right to study, language of instruction, educational institution, starting date and number of academic terms attended, previously completed qualifications or degrees and data on income, employment and periods of work.

- In addition, Statistics Finland receives personal data directly from the participants of the survey. There are questions in the form on your state of health and possible disability (information belonging to sensitive data categories).

## 7 Sources of personal data

- The national VIRTIA information resource for higher education institutions (right to study, information on qualifications and degrees, year when studies started, information on graduation, higher education institution).
- Data obtained from a register maintained by Statistics Finland based on the Population Information System (postal address data, personal identity code, student's mother tongue, age and gender). Previously completed qualifications or degrees are obtained from Statistics Finland's register on qualifications and degrees and employment and occupation and periods of work during studies from the employment statistics data.
- Student contact details supplied by higher education institutions (the educational institution's own email address and the student's secondary email address and telephone number). Other contact details used in the survey: registers kept by public authorities from which data is obtained under the Statistics Act.
- Finnish Tax Administration: Incomes Register.

## 8 Processors and recipients of personal data

Processors of personal data:

- Statistics Finland. Statistics Finland is the processor of personal data on behalf of the Ministry of Education and Culture. Statistics Finland obtains student contact details from the VIRTIA database.
- CSC - Finnish IT Centre for Science Ltd. The Finnish IT Centre for Science is the processor of personal data on behalf of the Ministry of Education and Culture. The Finnish IT Centre for Science transmits the contact details of students from the higher education institutions to Statistics Finland for the purpose of data collection. The Finnish IT Centre for Science provides Statistics Finland with study rights information from the VIRTIA information resource it maintains.

## 9 Transferring personal data outside the EU or the EEA or to international organisations

The personal data will not be transferred outside the EU or the EEA or to any international organisations.

## 10 Personal data retention periods

Personal data contained in the survey data is erased once it is no longer necessary for the purposes of the survey. Personal data will be erased at the latest at the end of 2026.

## 11 Data subject rights

Data subjects have the right to be informed by the controller of whether their personal data are processed. Data subjects also have the right to request from the controller:

- access to the personal data on themselves
- correction or erasure of personal data which are inaccurate or out of date
- restriction of the processing of personal data

If data subjects discover that their personal data have been processed unlawfully, they have the right to lodge a complaint with the Data Protection Ombudsman.

## 12 Automatic decision-making and profiling

Personal data are not used for automated decision making or profiling.

## 13 Protection of personal data

In its capacity as the controller, the Ministry of Education and Culture has taken the necessary technical and organisational measures to ensure that the data are secure and also requires this of the processors of personal data.

## 14 Processors and recipients of anonymised data

Together with the EUROSTUDENT consortium member ResearchNed BV (Sint Annastraat 198, 6525 GX Nijmegen, The Netherlands), the FDZ-DZHW (Lange Laube 12, 30159 Hannover, Germany) will create an anonymised Scientific Use File and a Campus Use File for EUROSTUDENT. These anonymised data files will be made available to the EUROSTUDENT project including their consortium members, scientists and other users for teaching, scientific and statistical non-profit purposes.