



Register Description
Data Protection Act (1050/2018)

<p>1 Data Controller</p>	<p>Name SYKLI Environmental College Address Kaartokatu 2, 11100 Riihimäki, Finland Phone +358 50 529 6428 Email info@sykli.fi Internet www.sykli.fi</p>
<p>2 Contact Person for Registry Matters</p>	<p>Kirsi Tuikkala-Kalminen</p>
<p>3 Name of the Register</p>	<p>Visma InSchool Primus System</p>
<p>4 Purpose of Processing Personal Data</p>	<p>The Visma InSchool Primus system is a comprehensive school administration system used to manage educational institutions, school offices, or, if necessary, the entire municipal/city education sector. It does not require any other software or system alongside it. The core program of this information system is Visma InSchool Primus. From the perspective of the Publicity Act, all other programs included in the system can be considered as auxiliary or tool programs. Other programs included in the system are the timetable planning program Kurre and the common web interface Wilma for both Primus and Kurre.</p>
<p>5 Content of the Register</p>	<p>Primus contains the following personal registers: student register (including guardian information), teacher register, staff register, substitute register, applicant register, workplace supervisors and evaluators register, workplace trainers register, management committee register, and education inspectors register. Personal data is also included in registers such as assessment records and registers for pedagogical documents, support measures, work-based learning, demonstrations, and the recognition of competencies.</p>
<p>6 Regular Information Sources</p>	<p>The main sources are the Population Register, the municipal/city education department and other administrative sectors, as well as teachers, students, and their parents. Information is also obtained from the students' previous educational institutions, regional state administrative agencies, and the Matriculation Examination Board.</p>
<p>7 Regular Disclosures of Information</p>	<p>Certain personal data is regularly disclosed to authorities, such as the Social Insurance Institution of Finland (Kela). Information can also be discretionarily disclosed for other purposes, such as for applications to further studies. Some information may also be published, for example, on the educational institution's website. Individuals have the right to prohibit the disclosure and publication of their information.</p>
<p>8 Transfer of Data Outside the EU or EEA</p>	<p>Personal data can be transferred within the European Union, the European Economic Area, or other countries that the European Commission has determined to provide an adequate level of data protection.</p>

<p>9 Principles of Register Protection</p>	<p>The use of the information system requires a personal user ID. Access rights are granted by user groups. Access is limited to those employees of the data controller who need the information for their job duties.</p>
<p>10 Right of Inspection</p>	<p>The registered individual has the right to inspect their personal data. The right of inspection is exercised by submitting a request for inspection personally to the contact person responsible for the register mentioned in section 2, either with a signed or similarly authenticated document, or by visiting the data controller in person.</p>
<p>11 Right to Demand Data Correction</p>	<p>The data controller shall, on their own initiative or at the request of the registered individual, correct any incorrect, unnecessary, incomplete, or outdated information that the registered individual cannot modify themselves.</p>
<p>12 Date and author of the register description</p>	<p>Date: August 25, 2022 Author: Jari Heiskanen</p>



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Instructions for Completing the Register Description

Read the instructions before filling out the register description. Use the attachment if necessary.

1. The data controller refers to a person, community, or foundation for whose use the personal register is established and who has the right to decide its use. For example, a company, authority, or association can be a data controller, not a specific department, employee, or IT service company maintaining the register technically.

If the data controller does not have a place of operation in the European Union but uses equipment located in Finland for processing personal data for purposes other than just transfer through this area, the data controller must appoint a representative in Finland. This representative, along with their contact information, is marked next to the name of the data controller in section 1.

2. The contact person can be approached with various inquiries concerning the processing of personal data.
3. The personal register is given a name that indicates the purpose of the register (for example, a customer register, a personnel management register).
4. The purpose of processing personal data explains for which task of the data controller the personal register is established. Personal data can be processed, for example, for managing a customer relationship, service relationship, or membership. This section can mention the legal provision on which the processing of personal data is based (e.g., Section 8 of the Personal Data Act or Chapter 4, or a provision of a special law). If the processing of personal data has been outsourced, it can be mentioned in this section.
5. The description includes the data or types of data that can be stored about the registered person. Identification information of the person is detailed (e.g., name, date of birth, and contact details). Otherwise, a description of data types or groups may suffice (e.g., information about services ordered by the customer, their delivery, and billing). The information can be grouped with subheadings.
6. Description of where the data stored in the register regularly comes from. Data can accumulate in the data controller's own operations, be obtained from the registered person themselves, or through transfers from other personal registers. If data is obtained through transfer from elsewhere, indicate on what basis the transfer occurs. The basis can be, for example, the registered person's consent or a statutory provision. The Personal Data Act does not require the reporting of regular data sources, but it is appropriate for the description of personal data processing.
7. Are personal data regularly disclosed? If data is disclosed, to whom it is disclosed. Also, explain what data is disclosed and on what basis the disclosure is made. The basis for disclosure can be the registered person's consent or a statutory provision. Disclosing information to a contractor in outsourcing situations of personal data processing is not considered disclosing personal data. Mention outsourcing in section 4 of the description.
8. Is personal data transferred outside the European Union or the European Economic Area?
9. Protection of manual material can be described, for example, by mentioning storage in a locked space. For computer-processed data, it is stated how the data is protected from external parties and how access rights within the organization are limited. Describe the general principles of protection. Do not disclose details that could compromise data security. It is also good to note whether the personal data stored in the register are deemed confidential.
10. Date of preparation of the register description and the name of the author.