

## Personal data processors and transfers outside the EU/EEA area

8 December 2023

The ones (Data Processors) researchers generally use for scientific research are marked in green.

The Data controller (University of Jyväskylä) can outsource the processing of personal data by agreement. Data Processor is a specific role defined in data protection legislation. A data subject has the right to know to whom their personal data are transferred. Data subjects also have the right to know whether their personal data are transferred outside the EU/EEA area, what the appropriate protective measures are, and where they can get a copy concerning these. The copy refers to so-called Commissions model contract clauses. In addition to the model contract clauses, a protective measure can be the Commission's decision on adequacy, or in transfers to the United States, the company's participation in the EU-U.S. Data Privacy Framework arrangement. The model contract clauses are available from the JYU Registry Office ([kirjaamo@jyu.fi](mailto:kirjaamo@jyu.fi)) if personal data are transferred. In addition, the Data Controller must have signed a Data Processing Agreement for personal data with the Data Processor.

<i>Data Processor, i.e. a party to whom the processing of personal data has been outsourced</i>	<i>Processing act using</i>	<i>Description of the object of agreement (purpose) (general description of the data to be processed)</i>	<i>Whether personal data are transferred outside the EU/EEA area</i>
1. Agendum Oy, Digital security model	In administration's use for data management	Purposes of processing: the accessibility and integrity of data saved in the service, incl. backup copying and logging, user identification and help in problem situations. Type of personal data and data subject categories: personal data of the client's root users and other users. Contact information (name, email, phone number), technical identifiers and logs (IP addresses, login data, change log) and content saved by the person (messages, saved descriptions, etc.)	Data can be processed outside the EU/EEA area when using specified subcontractors, but it is not allowed to transfer the data to outside the EU/EEA area for storage.  Transfers and protective measures: the United States (EU-U.S. Data Privacy Framework registered operators)
2. <b>ATLAS.ti</b> Scientific Software	Research	An instrument for qualitative studies or qualitative data analysis. Used in scientific research.	The data analysed in this service are not transferred to outside

## Personal data processors and transfers outside the EU/EEA area

Development GmbH			the EU/EEA area.
3. Atomi, Studyo Oy	Teaching	Electronic qualification certificates. Contact information of the client's staff, personal identification data and certificate data.	The data are located in Google Data Center in Hamina. Basis for transfer for the United States EU-US Data Privacy Framework.
4. ATOP/ATOPflow, ATOP-Tieto Oy	Cleaning	Quality control software for cleaning. Contact information, user data, log data.	Not transferred.
5. Asio, Asio-Data Oy	Accommodation bookings (Konnevesi) or workspace bookings for JYU facilities	Procurement of the ASIO booking system for research equipment and the (chargeable) accommodation services of Konnevesi Research Station. The register of the booking system includes name, email, phone number, and additional information on the customers. In addition, the University uses Asio for workspace bookings. Workspaces can be booked by employees and grant researchers.	Not transferred.
6. BEM, Buildercom Oy	Real estate maintenance	BEM data system service for the management of real estate care and maintenance, facility and device data and maintenance. Service users' contact information and data on the usage of the service. Additional information: <a href="https://jyu.fi/bem">BEM data system service— University of Jyväskylä (jyu.fi)</a>	Not transferred.
7. Canon, Canon Oy	Printing management	Printing and printing management services, maintenance centre services. Contact information, user data, log and system control data.	Not transferred.
8. Certia Oy, SAP, BASWARE, MEPCO and a misconduct reporting channel in accordance with the	HR administration systems (HR), Whistleblower channel (Legal Affairs)	Financial administration, HR administration and system services. Personal data and system usage data related to financial and HR administration.  Whistleblowing channel, personal data are processed to detect, investigate and prevent any illegal conduct. Basic data such as name, email address, and organisational position or title. Report data, including all information provided by the whistleblower, for example the identity of the alleged wrongdoer, identities of the witnesses or	Not transferred.

## Personal data processors and transfers outside the EU/EEA area

Whistleblower Protection Directive		third parties otherwise related to the alleged misconduct, description and grounds of the alleged misconduct as well as any other relevant information.	
9. Converis, Clarivate Analytics	Research information management	The purpose of the processing of personal data is to display the research activities and expertise of JYU staff and postgraduate students as well as other JYU-affiliated persons, by publicising data related to their research activities and expertise (e.g. for supplementary funding applications and project activities, conducted research, metadata of research data, publications, international mobility, and CVs).	Not transferred. A change in the agreement has been negotiated, and Clarivate support has no access to Converis data in order to sort out technical problems so that data would be transferred outside the EU/EEA area.
10. CsC –ICT Center for Science Ltd	Service production for Research, education and culture	CSC processes personal data on behalf of JYU as regards the following systems: <b>Arvo – Impact data service of education administration</b> (Arvo) is used e.g. for learner’s feedback and follow-up surveys, which collect feedback data to the system. More specific information: Description of the current state of data processing - <a href="#">Arvo - Impact data service of education administration - Eduuni-wiki</a> <b>OILI sign-up system for the academic year.</b> More specific information: Data protection <a href="#">and about processing of personal data – Signing up as a student and for a semester - Eduuni-wiki</a> <b>Admission test service for universities’ entrance exams</b> for years 2022–2023 and 2024–2025. More specific information, Description of the processing of personal data: <a href="#">Admission test service for universities’ entrance exams – Cooperation between higher education institutions and CSC - Eduuni-wiki</a>	Not transferred.

## Personal data processors and transfers outside the EU/EEA area

		<p><b>Cross-studying service</b> , where the purpose of processing is to transfer data related to study provision, registrations and study records with the partner universities joined in the cross-studying service. Processing of personal data – <a href="#">Cross-studying service - Eduuni-wiki</a></p> <p><b>Exam service order</b>, EXAM is a system that enables the demonstration and assessment of well-rounded and flexible competence. A teacher can use EXAM to carry out and assess various exams and competence demonstrations. Students get a flexible choice for the time and place for taking the exam. <a href="#">EXAM - EXAM - Eduuni-wiki</a></p> <p><b>KOHA service order</b>, a library system</p> <p>Service order for the <b>Certia server capacity</b></p> <p>Processing other than those taking place under a framework agreement</p> <p>Funet membership agreement:</p> <ul style="list-style-type: none"> <li>• <b>Funet Filesender, a browser-based service for sending files</b>, <a href="#">Funet FileSender – Privacy notice/ Privacy Policy</a></li> <li>• Eduroam <a href="#">eduroam-privacy-framework-funet.pdf</a></li> <li>• Certification service, Funet Certification Service delivers server and personal certifications to a Funet member organisation.</li> <li>• <a href="#">Funet Backup service * - Funet - Eduuni-wiki</a></li> <li>• <b>Funet: Funet Miitti (Zoom) video conferencing connection</b></li> <li>• Funet: IP-back-up connection</li> </ul> <p><b>Haka</b> login (circle of trust)</p> <ul style="list-style-type: none"> <li>• Connection agreement between a member of the circle of trust and a partner.</li> </ul>	
11. Dreambroker, Online Video Software Company	Video production	A cloud service enabling internal and external sharing of video records (e.g. YouTube integration). Video recording, editing and publishing can be made by a mobile device.	<p>Not transferred.</p> <p>Published videos are freely available to anybody, however, also outside the EU/EEA area.</p>

## Personal data processors and transfers outside the EU/EEA area

12. Dynasty, Innofactor	Case management, a case management system	<p>Data for the register are collected from the documents received by JYU and created at JYU. The submitters of documents include customers, JYU staff members and also various organisations from Finland and abroad.</p> <p>The following data are registered in the case management system:</p> <ul style="list-style-type: none"> <li>•The instigator of the case (commissioner), who can be a natural person (name).</li> <li>•Document type and content (heading, description).</li> <li>•The date of arrival / creation of the document.</li> <li>•Intermediate measures taken.</li> <li>• A case document may include personal data submitted/requested in connection with the handling of the case.</li> <li>• Some case documents may include delicate personal data, in which case these parts of the documents call for secrecy.</li> </ul>	Not transferred.
13. Enegia, EnerKey	Responsibility reporting and energy management	Energy reporting, alarm service, document service, data API service, energy management service, invoice management services, expert services, cost reporting service. Contact information, log data.	Not transferred.
14. Enkora, Enkora Ltd	Lockers (storing) and group exercise	<p>A student gets access to a locker by showing a copy/student/bus ID card to the touch screen reader. The system saves an event identification number not based on personal data. As for staff, the users of a mail locker and locker rooms show in the system. Staff contact information.</p> <p>Group exercise: In connection with the maintenance and support services included in the agreement, the processor has access to the Data Controller's personal data. Used to register for group exercises. Data related to customer relations and information security.</p>	Not transferred.
15. File Gallery	Tender calculation and invoicing	Gallery is an enterprise resource planning system, which is used for tender calculation and invoicing. The supplier processes personal data only for Gallery's maintenance, information security management, and in tasks commissioned by the client. The following types of data can be saved in Gallery: a person's name and contact information, organisation, segmenting (e.g. client,	Not transferred.

## Personal data processors and transfers outside the EU/EEA area

		lead, prospect) as well as usage information (e.g. messages, tenders, commissions).	
16. Funidata - Sisu	Study administration	<p>An entire system for study administration and the management of teachers' and students' study administration activities.</p> <p>Student's data. For students, we save their basic and contact information, study-related data.</p> <p>Teacher's/administrator's basic information</p> <p>For staff, we save user data.</p> <p>Log data.</p>	Cloud service suppliers providing Funidata capacity service can get a chance to process personal data operating from outside the EU or EEA area. United States EU-US Data Privacy Framework and model contract clauses.
17. Google	<a href="#">G Suite for Education account for staff— Digital Services (jyu.fi)</a>	<p>Categories of Data</p> <p>Personal data submitted, stored, sent or received by Customer, its Affiliates or End Users via the Services may include the following categories of data: user IDs, email, documents, presentations, images, calendar entries, tasks and other data.</p> <p>Data Subjects' Personal data submitted, stored, sent or received via the Services may concern the following categories of data subjects: End Users including Customer's employees and contractors; the personnel of Customer's customers, suppliers and subcontractors; and any other person who transmits data via the Services, including individuals collaborating and communicating with End Users.</p> <p><b><i>Note! It is not permitted to handle any data-protected material in Google services, such as personal data, study records or course performance assessments.</i></b></p>	Customer (as data exporter) enters into the Model Contract Clauses with Google LLC (as data importer) within the Admin Console, then: <ul style="list-style-type: none"> <li>i. the transfers will be subject to the Model Contract Clauses; and</li> <li>ii. Google will ensure that Google LLC complies with its obligations under the Model Contract Clauses in respect of those transfers;</li> </ul>

## Personal data processors and transfers outside the EU/EEA area

			Agreement: <a href="#">Google Workspace Terms of Service – Google Workspace</a>
18. Kielo, CGI fi	Management of business premises	<p>Business premise rentals and /or services.</p> <ul style="list-style-type: none"> <li>•contact information; such as name, address, email address, position, phone number, role in customer’s organisation, possible contacts with other organisations</li> <li>•Identification information; such as date of birth</li> </ul>	Not transferred.
19. Kongressi, Data Prisma Oy	Event administration	Signing up for staff trainings and events. Data collected upon registration usually comprise a name, phone number, email address, JYU user ID, and the customer’s participation in a course.	Not transferred.
20. Koodi/Postiviidakko, Liana Technologies Oy	Marketing	<p>Producing advertisements for the client’s register.</p> <ul style="list-style-type: none"> <li>- Name</li> <li>- Email address</li> <li>- Mobile phone number</li> <li>- Company and position</li> <li>- Company’s address information</li> </ul>	Not transferred.
21. LimeSurvey	A survey software	Not used, use Webropol (Webropol Oy) or the REDCap survey software for making surveys (no processor in JYU’s own Data Center).	
22. Microsoft JYU-administered cloud services	O365, OneDrive, Teams, OneNote, Sharepoint. JYU Teams (video, chat, audio calls) JYU MS Stream, JYU MS Forms	Online services for Microsoft’s volume licences	Personal data are transferred outside the EU/EEA area in order to carry out Microsoft’s user and support services. The transfer is justified by the contract terms of the Microsoft

**Personal data processors and transfers outside the EU/EEA area**

			Online Services, including the model contract clauses approved by the European Commission (Appendix 3), which can be read at <a href="http://www.microsoftvolumelicensing.com/Downloader.aspx?documenttype=OST&amp;lang=Finnish">http://www.microsoftvolumelicensing.com/Downloader.aspx?documenttype=OST&amp;lang=Finnish</a> (online service terms), United States EU-US Data Privacy Framework.
23. MIRO, RealtimeBoard Inc., dba Miro 201 Spear Street, Suite 1100 San Francisco, CA 94105	A digital tool	The online collaborative whiteboard platform to bring teams together. Name and email.	Yes, transferred. Personal data are transferred to the United States on the grounds of the model contract clauses (available as an appendix to the agreement from the JYU Registry Office).
24. Mobility Online, SOP Hilmbauer & Mauberger GmbH & Co.	Student exchange administration	Administration, maintenance and support activities for international education cooperation (student exchanges). Data concerning student and staff mobility.	SOP Hilmbauer & Mauberger GmbH & Co, the data processor, does not transfer any personal data.



**Personal data processors and transfers outside the EU/EEA area**

			However, JYU delivers to the host organisation relevant personal data on people leaving for exchange outside the EU/EEA area. The delivery is based on the person's consent. A person heading outside the EU/EEA area is told that the level of information security does not necessarily match the EU standard.
25. NextCloud	Processing/saving of research data	NextCloud is located in JYU's own Data Center, <b>so there is no separate data processor dealing with personal data.</b> <i>For the sake of clarity, this item is nonetheless included in this table</i> (not mentioned in the processors section of the study-specific privacy notice).	No data are transferred.

## Personal data processors and transfers outside the EU/EEA area

26. OrCID ( <a href="https://orcid.org/">https://orcid.org/</a> )	Management of ORCID identifiers	<p>When members use the ORCID Member API to transfer personal data to us, ORCID acts as the Controller of the received personal data, whereas in the case of a member using the Member Portal, ORCID acts as a Processor. Categories of personal data transferred</p> <ul style="list-style-type: none"> <li>• name (including variations of the data subject's name), email address, online and other social media profiles</li> <li>• details of grants and funding awarded or applied for by data subjects</li> <li>• details of researcher papers and other submissions (e.g. peer reviewed publications) or works developed or contributed to by data subjects</li> <li>• details of entities which the data subject is affiliated with or employed by</li> <li>• details of the data subject's education, qualifications, awards, honours, membership, service and positions (e.g. visiting fellow)</li> <li>• any other personal data that may be submitted to ORCID</li> </ul>	The importer is located in the USA. Standard contractual clauses / ORCID and JYU Controller-to-Controller and Controller-to-Processor SCCs August-September 2021
27. PremiTime	HR, working hours control	Additional information HR Services.	Additional information HR Services.
28. Qreform Oy, Rego	Risk management	The following data can be saved to a personal profile: the employee's basic information and organisation data.	Not transferred.
29. RecRight, Mobile CV Oy	HR	Job-seeker interviews (when needed, used for student admissions)	No personal data are transferred.
30. REDCap survey software	Research, surveys	A survey software maintained in JYU's own Data Center, <b>so there is no separate processor of personal data.</b> For the sake of clarity, this item is nonetheless included in this table (not mentioned in the processors section of the study-specific privacy notice).	No personal data are transferred.
31. Secapp, Secapp Oy	Safety, risk management, an alarm and communication application	<p>User IDs and other identification data (e.g. name, phone number, email address).</p> <p>The University deploys (upon the user's consent) location data only for those working alone on the ground or in waterways. Location data is used for locating the user in an emergency.</p> <p>Smartphone operating system data for the delivery of messages.</p>	Not transferred.

## Personal data processors and transfers outside the EU/EEA area

		<p>The content of messages sent between users, which may include e.g. text and images, video and audio recordings, location data and various files.</p> <p>Information about service usage, such as e.g. log data and record chain data (audit trail).</p>	
32. SarakeSign Sarake Oy	Making contracts	A service produced and provided by Sarake Oy, which enables electronic signing of documents and sending them to others for reviewing and signing. In connection with the maintenance and support services included in the agreement, the processor has access to the Data Controller's personal data, for example in the context of troubleshooting or sorting out errors.	No personal data are transferred.
33. ServiceNow or help.jyu.fi Fujitsu Finland Oy	Management of service requests	As a centralised service management system for the University's service provision, HelpJYU is used for the processing and statistics of service requests, fault reports, orders and advice as well as for managing workflows involving approvals. In addition, the system is used for maintaining a knowledge base (instructions) and dealing with information security breach reports.	Not transferred.
34. SoleTM, Solenovo	HR	An accounting system for staff's work plans and working time (SoleTM)	Not transferred.
35. Studyportal	-	A system for the "recruitment" of foreign students	Personal data are transferred only as anonymised.
36. Suunta Meklarit Oy	HR	Management of insurance and accident issues as a continuous service, competitive bidding and enactment of insurances	Not transferred.

## Personal data processors and transfers outside the EU/EEA area

37. TalentAdore	HR	<p>A system for staff recruitment. The actual purpose of the service is not to process the Data Controller's (JYU) personal data, but in connection with the maintenance and support services included in the agreement, the processor has access to the Data Controller's personal data, for example in the context of troubleshooting or sorting out errors.</p> <p>The types of personal data dealt within the system include</p> <p>Job-seekers</p> <ul style="list-style-type: none"> <li>o Data given by the applicant</li> <li>o Notes and classifications made by users as well as interview appointments</li> <li>o Evaluation statements of external experts about a person's aptitude for the post</li> <li>o Video recorded applicant responses e.g. at the interview stage</li> <li>o Log data formed by the system</li> </ul> <p>Users of the system</p> <ul style="list-style-type: none"> <li>o User data: Name, user ID, email address, user-right roles</li> <li>o User-made notes and classifications of the applications and interview appointments</li> <li>o Log data formed by the system</li> </ul>	<p>The processor of personal data is allowed to transfer personal data outside the ETA area only to such countries, territories, or international organisations that – according to the European Commission's decision – ensure a sufficient level of data protection. Here, the notion of transfer also covers cases where the data are located on a server in an ETA country but can be accessed from a third country.</p>
38. Thinking Portfolio Oy	Operational control	<p>Project portfolio planning, definition, prototype and technical parameter design.</p> <p>User data (login).</p> <p>In connection with maintenance and support services, the processor has access to the Data Controller's personal data.</p>	Not transferred.
39. Turnitin	Study administration	Plagiarism detection, checking the originality of study performance texts	<p>Personal data are transferred to the United States, protected with model contract clauses available from JYU Registry Office.</p>

## Personal data processors and transfers outside the EU/EEA area

40. Visma InSchool software Kurre and Wilma Visma Community Oy	Student administration	Teacher Training School pupils	Not transferred. Privacy protection clause followed by the processor: <a href="https://www.visma.fi/yksityisyydensuoja/etusivu/">https://www.visma.fi/yksityisyydensuoja/etusivu/</a>
41. Wistec online Wistec Training Oy	Staff training	O365 services and Teams trainings. Wistec Training Oy (Wistec) processes your user ID and password data upon logging in. You can view and control from your user profile when you are logged in the service. According to the agreement signed between JYU and Wistec, Wistec sends JYU a report on users' loggings to the service and also about the courses completed. The reported information is used for monitoring the utilisation rate of the service.  You can find additional information from Wistec's ' <a href="#">privacy notice and also from JYU privacy notices for staff and students</a> '.	Not transferred. The University does not use a service where the service provider would communicate directly to the staff (Mailchimp service), neither does JYU order any surveys that would use the Survey Monkey service.
42. Plandisc, Plandisc ApS, Grimhøjvej 6, DK-8220 Brabrand, Denmark, Central Business Reg. No. 37204854	A digital tool	Plandisc is a tool for designing circular calendars.	We are not aware that personal data would be transferred.

#### Personal data processors and transfers outside the EU/EEA area

43. Qreform Rego	A tool for the University's overall risk management and educational control	<p>Rego offers effective solutions for the following domains:</p> <ul style="list-style-type: none"> <li>• Risk management, from company-level risk assessment to the risk management of daily work</li> <li>• Hazard event reporting, covers all areas of safety within the same system</li> <li>• Qualifications management and competence development, statutory and the organisation's own qualifications and unit-specific familiarisation as well as well-rounded training programmes related to qualifications.</li> </ul> <p>The following data can be saved in a personal profile: First name, Surname, Email address, Role, Title, Language of use, Description, Street address, Postal code, Post Office, Country, Business unit, Supervisor, Team, Internal user ID, Personal ID number. Connected to these data, the system saves the following user-specific data items: Organisation data, Organisation unit data, Organisation unit's person in charge and supervisor data, Processed documents, Completed trainings, Achieved qualifications, Stages of different processes where the user is involved or in a responsible role, work teams or matrices, work shift data, worktime and work experience data.</p> <p>The viewing and editing of personal data in the system is controlled by a log database. These log data can be accessed by system admin rights only. From the system, it is possible to compile a report on the user IDs used for viewing personal data. In specific cases of use and those specifically defined in customer agreements, it is also possible to process personal health data related to accidents, for instance (description of the accident, other injury description) as well as personal identification code or another strictly identifying personal data.</p>	Not transferred.
44. Signicat	Student identification	Biometric identification of international degree students	Not transferred.

## Personal data processors and transfers outside the EU/EEA area

45. Sirius HR, Terveystalo	HR	<ul style="list-style-type: none"> <li>- Basic data on employees</li> <li>- employment relationship and organisation data</li> <li>- Data on absences</li> <li>- Memos</li> </ul>	Not transferred. The supplier is not entitled to move any servers or their control related to the implementation of the agreement, or any other work pertaining to the implementation of the agreement and data sets covered by the agreement, to be handled in a country outside the ETA area.
46. ThingLink	A digital tool	Build visual learning experiences by means of interactive images, videos and the 360 media.	Review in progress
47. ThinkingPortfolio Oy	A tool for project management.	<p>The actual purpose of the service is not to process the Data Controller's personal data, but in connection with the maintenance and support services included in the agreement, the processor has access to the Data Controller's personal data, for example in the context of troubleshooting or sorting out errors.</p> <p>The supplier processes the client's personal data (personal data groups such as employees, customers, consultants, etc.). The data model for user management includes a person's first name, surname, and public email address. Other data items include the person's user rights; Role defined by the Data Controller's root user (e.g. Project Manager, steering group member).</p> <p>In addition, usage generates log data.</p>	Not transferred.
48. Webropol	A survey software	Introduction of a survey and course feedback system, system maintenance as an external service	Not transferred.

#### Personal data processors and transfers outside the EU/EEA area

49. Wilmoittaja, NetProfit Oy	A notification delivery service	A service by means of which the Teacher Training School as a Wilma-user can create alarms and reminders of chosen issues such as ○ Assessments delayed ○ A student has absences exceeding the limit ○ A new applicant has appeared via the education calendar ○ Different stages of an application/decision process Data are processed in the Wilmoittaja service only and solely for sending the messages delivered within the service.	Not transferred
----------------------------------	------------------------------------	---	-----------------

\*Please note that this list will be revised along as new services are adopted or as some are removed. Data processing agreements can also be made on a case-specific basis for a fixed term, e.g. for a transcription service. In such a case, this is informed to the data subject with the relevant privacy notice.

For further information or notify about possible errors or omissions: tietosuoja@jyu.fi