

Privacy notice with regard to eduroam institutions

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This privacy notice states how **Centria-university** deals with your personal data when you use the eduroam service.

eduroam is a collaboration between education and research institutions that aims to give students, researchers and staff easy and secure access to the fixed and wireless networks of all educational and research institutions participating in eduroam. eduroam offers a process to access the network of these institutions. All you need to do is configure eduroam on your equipment just once.

More information on how eduroam works and the participating institutions in Finland is available here: <https://www.eduroam.fi>.

We have divided the privacy notice into different chapters.

1. **Who are we?**
2. **What data do we use for eduroam?**
3. **For what purposes do we use your data?**
4. **Who has access to your data?**
5. **Security and storage period**
6. **Your rights as a user**
7. **Amendments**
8. **Questions**

1. **Who are we?**

We are Centria-university (<https://web.centria.fi/>). We operate eduroam together with other education and research institutions all over the world. As a participating institution, we can act as a Home Institution or a Host institution within eduroam. The Roaming Operator in Finland is Funet. It has its own privacy notice available at <https://www.eduroam.fi>.

To ensure that you are well informed, we have clearly listed the roles that the participating parties may adopt within eduroam below:

1. **Home Institution**: is the institution that has provided you with the login data you use to log into eduroam. It is also referred to as the 'Identity Provider'.
2. **Host Institution**: this is the institution where you are a 'guest'. The Host Institution is also known as a 'Service Provider'.
3. **Roaming Operator (RO)**: this is the party that handles the communication between the Home Institution and the Host Institution (Funet).

This notice describes the role of Roaming Operator to give you a better understanding of eduroam's operation. The RO is primarily responsible for the management of the national RADIUS servers, which handles the communication between institutions. For more information on the role of Roaming Operator in Finland, read Funet's privacy notice at <https://www.eduroam.fi>.

Each party is independently responsible for personal data processing as part of its role. If you want to find out more about how the roles of the parties involved are distributed, we refer you to the eduroam Privacy Framework at <https://www.eduroam.fi>.

For example, the Home Institution is independently responsible for the Identity Management System it manages for its own students and the Roaming Operator is independently responsible for managing the communication that runs through the national RADIUS servers. All parties are also independently responsible for the log data they store for eduroam. Although the participating institutions will process almost the same personal data for eduroam in practice, this may deviate slightly on some levels.

2. **What data do we use for eduroam?**

We process the following data about you for your use of eduroam, depending on the role we fulfil (Home Institution or Host Institution):

Home institution

If we are acting as your Home Institution, we will process the following data about you:

- **The MAC address of your laptop, tablet or mobile phone**
When you connect to eduroam, your unique device data are automatically submitted. This is also known as your MAC address.
- **Your username and password (authentication data)**
We use your username and password to verify who you are. For example, we receive this information from Host Institutions via the Roaming Operator when you log in there with these authentication data or we receive it directly from you when you log in directly with us.
- **Time of the authentication**
When we receive a request for authentication, we also process the timestamp associated with that request.
- **The access point you connect with**
We also receive the unique data of the access point you are trying to connect to when you log in with us. This is the MAC address of the relevant access point you are trying to connect with.
- **The identity of the Host Institutions you are visiting**
If you connect from an institution other than us, we will process the identity of this Host Institution.

Host institution

If you are a guest with us, we will process the following data about you:

- **The MAC address of your laptop, tablet or mobile phone**
When you connect to eduroam, your unique device data are automatically submitted. This is also known as your MAC address.
- **Your (encrypted) username and password (authentication data)**
The Home Institution uses your username and password to verify who you are. We will send these data to your Home Institution via the RO. You do not have to worry that we can see your password. Your password is always encrypted on your device and we send it to your Home Institution in encrypted form.
- **The access point you connect with**
We also receive the unique data of the access point you are trying to connect to when you log in with us. This is the MAC address of the relevant access point you are trying to connect with.
- **Time of the authentication**
When we receive a request for authentication, we also process the timestamp associated with that request.
- **The identity of your Home Institution**
If you try to connect to our network as a guest, we will send your authentication data to your Home Institution via the Roaming Operator. In this context, we will also process the identity of your Home Institution.

The above-mentioned data are also stored in log files.

3. For what purposes do we use your data?

Home Institution:

As the Home Institution, we use your authentication information to verify your identity. When we have verified your identity, the institution you are trying to log into (we or the Host Institution of your location) will determine whether you gain access to the eduroam network. We also need your MAC address to ensure that your authentication request can be handled correctly and the Host Institution's identity to answer the authentication request.

Host Institution:

If you are a guest with us, we will only process your (encrypted) authentication data to forward them to your Home Institution via the Roaming Operator. We use your MAC address to give you access to our network after your Home Institution has performed the authentication.

We process data for services and we save these data in log files. The purpose of these log files is limited to the management of the service, which includes internal verification of the processes, the security of eduroam, the provision of support, end user identification in the event of unauthorised use of eduroam and the handling of any resulting disputes. It also includes assistance in the investigation of criminal offences by the competent authorities.

We process your personal data primarily to protect the legitimate interests of the participating institutions and their end users. These interests consist of improved accessibility to a fast and secure Internet for end users without having to unnecessarily transfer personal data to multiple institutions. Our main principle for this is data minimisation.

If we process your personal data for the benefit of our legitimate interests or those of third parties, we have weighed up these interests against your right to privacy. We take every precaution to protect your privacy and to prevent your interests from being compromised where necessary. For more information on these interests, read the purposes for which we process your personal data in this privacy notice. We will provide you with more information on how we weigh up those interests on request. If you do not want your data to be processed by the Host Institutions, you can always choose not to connect to eduroam automatically (for example by not saving the authentication data on your device or by turning Wi-Fi off).

4. Who has access to your data?

Because of the nature of a roaming service like eduroam, we will share your data with other participating institutions that you connect to. When we are acting as a Host Institution as you connect to eduroam, we will share your personal data (in encrypted form) with the Roaming Operator, who will in turn forward them to your Home Institution.

In some cases, we will share your data with parties outside the EU, for example if you are studying abroad for some time.

By countries outside the EU we mean countries outside the European Economic Area (EEA), which consists of all EU countries, Liechtenstein, Norway and Iceland. In such cases, there is international transfer of personal data. The laws and regulations of these countries do not always offer the same level of protection for your personal data as the laws and regulations in Finland. If necessary, we will make sure that appropriate security measures are taken to ensure compliance with the rules on international transfers of personal data, such as the standard contractual clauses established at European level (see Article 46 of the GDPR) and we will assess whether there is an exception as referred to in Article 49 of the GDPR.

We will only share your data with third parties in special cases. Examples include: (i) to provide support, (ii) to resolve disputes and (iii) to comply with our legal obligations.

We also use a number of carefully selected suppliers, also known as processors, who in some cases have access to some of your data to provide their services. They are not allowed to use these data for their own purposes. For example, we store data on our own (local) systems, but we also use third parties to carry out this service on our behalf. We require all these suppliers to take appropriate security measures for your data and to act according to our instructions.

5. Security and storage period

The proper protection of your personal data is important to us. eduroam is set up in such a way that participating institutions do not see any more data than they need to provide access to the network and to manage it.

We ensure that your personal data are adequately secured against unauthorised use, access, modification and unlawful destruction. More information on how we strengthen eduroam's security is available at <https://www.eduroam.org/eduroam-security/>

We do not store your data for any longer than is necessary. In principle, we keep the log files of your personal data for up to 6 months. If we need your data to settle disputes, we will keep your data until the disputes have reached a final settlement.

6. **Your rights as a user**

As an eduroam user, you have a number of rights under the applicable personal data protection laws and regulations. For example, you can request us (i) to access the personal data we have for you, (ii) to correct your data, (iii) to have your data deleted, (iv) to restrict the processing of your data, (v) to transfer your data and (vi) to object to the processing of your personal data.

NB: In some cases, we may ask you to provide additional information so that we can establish your identity.

1. Right of access

You can ask us whether we are processing any personal data for you and you can receive a copy if you want to access them. When we grant your request for access, we will also provide you with additional information, such as the purpose of the data processing, the personal data categories and other information that you need to properly exercise this right.

2. Right to rectification

You have the right to correct your details if they are incorrect or incomplete. On your request, we will correct any incorrect personal data about you and we will complete any incomplete personal data, taking into account the purposes for which they are processed. This may also include the provision of an additional statement.

3. Right to removal ('right to be forgotten')

You also have the right to have your personal data deleted. This means that we will remove all your data and that other processors we previously shared your data with will do the same to the extent that this is possible. The removal of your personal data will only take place in certain cases as prescribed by law. These cases are mentioned in Article 17 of the GDPR. Some examples are cases in which your personal data are no longer required for the purpose for which they were originally collected and cases in which they were processed unlawfully. Because of the way we set up certain services, it may take some time before the back-ups have been deleted.

4. Right to restriction of processing

You have the right to restrict the processing of your personal data. This means that your data processing will be suspended for a certain period of time. Circumstances that may give rise to you exercising this right include cases in which the accuracy of your personal data is being disputed and it

is taking some time to verify this. This right does not prevent us from continuing to store your personal data. When the restriction is lifted, you will be informed in advance.

5. Right to data portability

The right to data portability means that you have the right to obtain the personal data about you in a structured, common, machine-readable format if technically possible and you are entitled to transfer it to another controller. We will transfer your personal data directly to the other controller on request if this is technically possible.

6. Right to object

You have the right to object to the processing of your personal data. This means that you can ask us to no longer process your personal data. This only applies if 'justified interests' are the legal basis for processing the data.

There may be situations in which we are entitled to deny or restrict the rights referred to in this chapter. We will perform a careful assessment of whether there is any reason for this in all cases and we will inform you accordingly.

For example, right of access can be denied if this is necessary to protect the rights and freedoms of others and we may refuse to delete your personal data if the data processing is necessary to meet our legal obligations. The right to portability of data cannot be exercised if you did not provide these personal data to us or if we did not process the data based on your consent or pursuant to an agreement.

If you want to exercise one of your rights, please send an e-mail to tietosuojavastaava@centria.fi. In the event of any unresolved problems, you are also entitled to file a complaint with the [Personal Data Authority](#).

7. **Amendments**

We may amend this privacy notice from time to time. The current eduroam privacy notice can be found at; <https://www.centria.fi/eduroam/>
Our general (not eduroam specific) privacy notice is available at <https://web.centria.fi/tietosuoja>, in Finnish.

8. **Questions**

We take your privacy seriously. If you have any specific questions or comments about your rights, it is best to first contact the ICT help desk or data protection officer of your Home Institution. They are responsible for your account with regard to this service. This contact information is also available on your Home Institution's website.

In the event that they are unable to help you, you can also address your questions to us. In that case, please contact our ICT help desk or data protection officer. The best way to reach us is through e-mail at helpdesk@centria.fi or tietosuojavastaava@centria.fi (<https://web.centria.fi/>).