

# Addition to the Privacy Statement for Otava's learning materials

**The Privacy Statement applies when Otava acts as the controller.** This section describes how Otava Publishing Company Ltd handles the personal data of teachers and persons who use Otava's digital learning materials, including other brands of the product, such as Finn Lectura.

The left-hand section, *Otava as the controller*, describes the situation in which Otava acts as the controller, i.e. when Otava determines the purposes and means of processing personal data. This is especially the case if Otava's learning materials are used for independent study, and the learning materials are not combined with teaching at a particular educational institution. In addition, when it is not a question of free upper secondary education and the use of related learning materials, Otava acts as the controller.

The right-hand section, *Otava as the processor of personal data*, describes the processing of personal data when Otava acts on behalf of another controller. This is especially the case when Otava's learning materials are used in basic education or in connection with free upper secondary education.

**When Otava acts as the processor of personal data, this Privacy Statement does not apply**, as the processing of personal data at Otava is guided by the instructions of the educational institution, municipality or other education provider acting as the controller. Below is a more detailed description of the roles and responsibilities of Otava and its customers.

	Otava as the controller	Otava as the processor of personal data
In which cases does Otava act as the controller or the processor?	<ul style="list-style-type: none"> <li>• students at upper secondary level (e.g. general upper secondary school, vocational institution), when               <ul style="list-style-type: none"> <li>○ the education <u>does not fall</u> within the scope of statutory free upper secondary education: always regardless of whether the product is paid for by the consumer or by an educational institution;</li> <li>○ the education <u>falls</u> within the scope of statutory free upper secondary education: from the moment the product was first used only until the student connects the licence to their school (thereafter, Otava acts as the processor of personal data);</li> </ul> </li> <li>• students in adult education (e.g. folk high school or workers' institution regardless of whether the product has been paid for by them or by an educational institution);</li> <li>• consumers who have ordered our products for e.g. self-study; and</li> <li>• teachers and other school staff, when Otava has acquired the information in a role other than the processor.</li> </ul>	<ul style="list-style-type: none"> <li>• pupils in basic education</li> <li>• students at upper secondary level (e.g. general upper secondary school, vocational institution)               <ul style="list-style-type: none"> <li>○ when the education falls within the scope of statutory free upper secondary education: from the moment the product is connected to the educational institution's licence management</li> </ul> </li> <li>• teachers and other staff, when Otava receives the information for the processing of personal data</li> </ul>
Can Otava act as both the controller and the processor?	<p>Yes, Otava can act both as the controller and the processor for the same person; for example, in the following cases:</p> <ul style="list-style-type: none"> <li>• with regard to student data, when a student uses digital learning materials in statutory education (Otava acts as the processor of personal data) and also purchases digital study material for self-study (Otava acts as the controller); or</li> </ul>	

	<ul style="list-style-type: none"> <li>with regard to teacher data, when a teacher uses digital learning materials in statutory teaching (Otava as the processor) and participates in a presentation of Otava's learning materials (Otava as the controller)</li> </ul>	
Who do I contact if I have questions? (1)	In questions related to data protection (such as reviewing or deleting data), you can reach us by email at <a href="mailto:tietosuoja@otava.fi">tietosuoja@otava.fi</a>	If you have questions about the processing of your data or want to exercise your privacy rights, please contact the school where you are a pupil.
What is the purpose of the processing? (3)	<p>Otava mainly processes personal data to supply products and services purchased from it.</p> <p>In addition, Otava may process personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>development of products and services</li> <li>management and analysis of customer and stakeholder relationships</li> <li>necessary customer communications</li> <li>marketing when enabled by legislation. Otava does not use pupils' or students' information for marketing purposes.</li> </ul>	<p>When Otava acts as the processor of personal data, personal data is mainly processed to deliver products and services.</p> <p>The controller for whom Otava acts as the processor of personal data may have also defined other purposes for the information. The other purposes of the processing are defined in a mutual contract between the controller (municipality, school or other education provider) and Otava.</p>
What is the basis for processing? (4)	<p>As a rule, Otava processes personal data on the basis of a contract (e.g. purchase of a product).</p> <p>In some cases, the basis for processing may also be</p> <ul style="list-style-type: none"> <li>a legitimate interest of Otava or a third party (e.g. product development)</li> <li>consent (e.g. digital marketing)</li> <li>a statutory obligation (accounting).</li> </ul>	As instructed by the controller.
What information do we collect about you? (5)	<ul style="list-style-type: none"> <li>The use of digital learning material requires at least an email address so that the product can be delivered to you.</li> <li>In addition, other information collected depends on, for example, how the product is purchased, how it is used, if Customer Service was contacted, and participation in events.</li> <li>Information collected from the usage includes, e.g. completing the user profile, content produced by the pupil, messages from other users, learning history, and usage data collected by cookies.</li> </ul>	<p>The use of digital learning material requires at least a name, email address, and school/group identifier so that the product can be delivered to you.</p> <p>Information collected from the usage includes, e.g. completing the user profile, content produced by the pupil, messages from other users, learning history, and usage data collected by cookies.</p>

<p>From which sources do we receive your information? (6)</p>	<ul style="list-style-type: none"> <li>• You provide your own information (e.g. purchasing products, registering as a user, registering for events)</li> <li>• Information is generated when you use services (e.g. use of digital learning material and website log data)</li> <li>• Teacher data is also collected from schools (e.g. from schools' websites or school secretaries)</li> </ul>	<p>Otava receives information from the school, municipality or other education provider. In addition, information is generated when you use the services.</p>
<p>Do we use your data for profiling? (7)</p>	<ul style="list-style-type: none"> <li>• We may use your personal data for profiling, i.e. to automatically process your personal data and evaluate certain personal characteristics. Otava does not make automated individual decisions that have legal or significant consequences.</li> <li>• In connection with the use of learning materials, we use analytical tools such as mathematical models and algorithms that are based on the data we collect when digital services are used. In practice, this refers to information on how the student functions and manages the use of learning material.</li> <li>• When services are used, the algorithms generate information that complements the users' learning profile. The information can be utilised in two ways: <ul style="list-style-type: none"> <li>○ to improve the service of an individual who uses learning materials; for example, by producing recommendations on learning content suitable for the individual student; and</li> <li>○ to improve the contents of Otava. Based on the data collected from users, we can determine, among other things, if a task is flawed or too difficult if the majority of users answer incorrectly.</li> </ul> </li> <li>• The impact of such processing on an individual data subject is limited and its primary purpose is to help the student to obtain content that serves them better. Profiling does not result in consequences for the data subject, such as content limitations.</li> </ul>	<p>As instructed by the controller.</p>
<p>Who can we share your personal data with? (7)</p>	<p>Otava may, at its own discretion, utilise processors in the processing of data to achieve the purposes presented above. In this case, the subcontractor processes the transferred data on behalf of and for the controller. Otava only uses its</p>	<p>As instructed by the controller.</p>

	<p>carefully selected partners and requires thorough and lawful processing of personal data.</p> <p>Otava does not <i>pass on</i> the personal data of pupils or teachers in a way that allows them to use the data for their own purposes (thus making the recipient the new controller).</p> <p>Otava Group companies form a joint register, i.e. the data can also be processed by other group companies.</p>	
<p>How long do we store your data? (10)</p>	<p>As a rule, personal data is stored for a maximum of five (5) years from the date of the licence's introduction (for example, a four (4) year licence and a storage period of one (1) year). However, personal data is always stored at least for the period when the pupil or teacher uses digital learning materials.</p> <p>If you have purchased a product from our online shop, we will store the identification information of customers and users of the online services for a maximum of six (6) years after the end of the customer relationship.</p> <p>We process teacher and school staff data as business contacts, whose data we process for a maximum of six (6) years after the person's role changes. For example, the role of a teacher may change based on changes in their school subject, if the teacher stops working as a teacher, or retires.</p>	<p>As instructed by the controller, however, at least for the period when the pupil or teacher uses digital learning materials.</p>