



# Roaming Operator Funet's eduroam privacy notice

*Version: 1.0*

This privacy notice states how Funet 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 Funet, a part of CSC – It Center for Science Ltd. based at Keilaranta 14, FI-02101 Espoo. We can be reached at [funyht\(at\)csc.fi](mailto:funyht(at)csc.fi). Together with our member institutions, we handle the operation of eduroam. We act as the Roaming Operator in Finland in this regard.

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. In Finland this is Funet, but our subcontractor Radiator Software Oy is primarily responsible for the management of the national RADIUS servers, which handle the communication between institutions.

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/tietosuoja>

For example, the Roaming Operator and its subcontractor are independently responsible for managing the communication that runs through the national RADIUS servers. The Home Institution is independently responsible for the Identity Management System it manages for its own students. 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?

As the Roaming Operator, we 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 (anonymised) username  
The Home Institution uses your username and password to verify who you are. Once we have received this information from the Host Institution, we will send it to the Home Institution. 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.

If you want to make sure that we also cannot see your username, you can follow the instructions from your Home Institution's ICT help desk, which are available on request. You can also check whether your Home Institution has made configuring even easier for you by doing the configuration for you with the eduroam Configuration Assistant Tool (CAT) available at <https://cat.eduroam.org>. After you have successfully configured your device, we will only process the anonymised username. Only the identity of your Home Institution can be derived from this anonymised username.

- Time of the authentication  
When we receive a request for authentication, we also process the timestamp associated with that request.
- The identities of the Home Institution and Host Institution  
As the Roaming Operator, we process the identities of both the Home Institution and the Host Institution.

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

### 3. FOR WHAT PURPOSES DO WE USE YOUR DATA?

We use your personal data primarily for the communication between the Host Institution and Home Institution for your authentication. For example, we use part of your authentication data to find out the identity of your Home Institution so that we can send the authentication request to it.

We process data for services and we save these data in log files. The purpose of these log files is limited to service management, internal process control, security and possibly the handling of disputes in case of unauthorised use. We also process your unique device data and timestamps for these purposes.

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. In some cases, we will share your data with parties outside the EU, for example if you are studying abroad for a period of time or if we are using cloud applications.

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. Funet will not keep their processed data for longer than 6 months. Processes in service providers, home institutions and host institutions may vary. 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 [privacy@cs.csc.fi](mailto:privacy@cs.csc.fi). In the event of any unresolved problems, you are also entitled to file a complaint with the Personal Data Authority available at <https://tietosuoja.fi/etusivu>.

## 7. AMENDMENTS

We may amend this privacy notice from time to time. If we amend our notice, we will try to inform you in the best way possible (for example with an e-mail from your Home Institution). Our current privacy notice is also available at <https://www.eduroam.fi/tietosuoja>.

## 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 at [privacy@cs.csc.fi](mailto:privacy@cs.csc.fi).