

# Workseed Privacy Statement

This privacy statement concerns the collection and processing of personal data in connection with the Workseed SaaS service ("Service") operated by Workseed Ltd ("Workseed").

For the avoidance of doubt, this is a general privacy statement concerning all users of the Service, and in the event one of the data controllers using the Service provides its own, more specific privacy statement regarding use of the Service by that controller, the information provided in such a controller's privacy statement should be consulted in addition to this privacy statement.

## 1. Controller and processors

The controller with regards to personal data processed in the Service is the educational institution or company that has purchased the Workseed Service for use within its own organisation. The contact details for the controller can be found on its own website and/or privacy statement.

The main processor for the personal data referred to above is Workseed (Business ID 2733384-1), email address for privacy inquiries: support@workseed.fi, physical address: Oppilaankatu 4, FI-53100 Lappeenranta, Finland.

Sub-processors used by Workseed to offer the Service include the following:

- SaaS platform provider (currently Microsoft Azure)
- Email notification service provider (currently SparkPost)
- Text message notification service provider (currently Quriiri)
- Identifying bots (CAPTCHA) (currently hQaptcha)

The processor and sub-processors process personal data subject to instructions from the controller, based on separate, written data processing agreements.

## 2. Data subjects

The personal data of three different groups of data subjects is collected/processed in connection with the Service:

- Employees or students of the controller ("Learners")
- Teachers or trainers of the controller ("Trainers")
- Assessors or trainers of external organisations ("External Assessors")

## 3. Categories of personal data

The following categories of personal data are collected/processed in connection with the Service. The processing of some of these personal data is necessary in order to use the Service.

## Learners

Category of personal data	Legal basis	Purpose of processing	Duration of processing
Name of Learner	Performance of contract between Learner and controller (GDPR Article 6(1)(b))	Identifying the user profile to give access to the Service, and to allow assessments of the Learner to be exported from the system	Personal data will be removed from the Service either when the controller ceases to use the Service, or at an earlier date defined according to the controller's privacy statement – however, data exported from the Service to the controller shall in any event be governed by the controller's privacy statement and any expiry dates defined therein
Contact information of Learner	Performance of contract between Learner and controller (GDPR Article 6(1)(b))	Identifying the user profile to give access to the Service, providing notifications and information to the user necessary to use the Service	
Picture of Learner (voluntary)	Performance of contract between Learner and controller (GDPR Article 6(1)(b))	Helping to identify the user for other users of the Service	
Information concerning company/institution Learner is associated with, as well as department/role of Learner	Performance of contract between Learner and controller (GDPR Article 6(1)(b))	Assigning Learner to correct controller, Trainers and External Assessors in order to use the Service as intended	
Test/assignment answers	between Learner and controller (GDPR Article 6(1)(b))  Legitimate interests of controller (GDPR Article 6(1)(f))	Carrying out assessments (i.e. the core function of the Service); allowing the controller to assess the performance of the Learner	
Assorted personal data that may be included in test/assignment answers	Performance of contract between Learner and controller (GDPR Article 6(1)(b))	Carrying out assessments (i.e. the core function of the Service)	

Category of personal data	Legal basis	Purpose of processing	Duration of processing
Learner's IP address, activity using the Service	Legitimate interests of controller/Worksee d (GDPR Article 6(1)(f))	<p>Detecting and fixing errors and malicious behaviour in order to ensure the Service is available and working as intended</p> <p>Anonymising certain personal data to create statistics concerning Service usage and the general level of performance of Learners associated with a certain controller</p>	

#### Trainers

Category of personal data	Legal basis	Purpose of processing	Duration of processing
Name of Trainer	Performance of contract between Trainer and controller (GDPR Article 6(1)(b))	Identifying the user profile to give access to the Service, and to ensure that the Trainer has the correct rights in the Service (i.e. normal user vs administrator rights)	Personal data will be removed from the Service either when the controller ceases to use the Service, or at an earlier date defined according to the controller's privacy statement – however, data exported from the Service to the controller shall in any event be governed by the controller's privacy statement and any expiry dates defined therein
Contact information of Trainer	Performance of contract between Trainer and controller (GDPR Article 6(1)(b))	Identifying the user profile to give access to the Service, providing notifications and information to the user necessary to use the Service	
Picture of Trainer (voluntary)	Performance of contract between Trainer and controller (GDPR Article 6(1)(b))	Helping to identify the user for other users of the Service	

Category of personal data	Legal basis	Purpose of processing	Duration of processing
Information concerning company/institution Trainer is associated with, as well as department/role of Trainer	Performance of contract between Trainer and controller (GDPR Article 6(1)(b))	Assigning Trainer to correct controller and Learners in order to use the Service as intended	
Test/assignment questions	Performance of contract between Trainerr and controller (GDPR Article 6(1)(b))  Legitimate interests of controller (GDPR Article 6(1)(f))	Carrying out assessments (i.e. the core function of the Service)	
Trainer's IP address, activity using the Service	Legitimate interests of controller/Worksee d (GDPR Article 6(1)(f))	<p>Detecting and fixing errors and malicious behaviour in order to ensure the Service is available and working as intended.</p> <p>Anonymising certain personal data to create statistics concerning Service usage and the general level of performance of Learners associated with a certain controller</p>	

## External Assessors

Category of personal data	Legal basis	Purpose of processing	Duration of processing
Name of External Assessor	Performance of contract between External Assessor and controller (GDPR Article 6(1)(b))	Identifying the user profile to give access to the Service	Personal data will be removed from the Service either when the controller ceases to use the Service, or at an earlier date defined according to the controller's privacy statement – however, data exported from the Service to the controller shall in any event be governed by the controller's privacy statement and any expiry dates defined therein
Contact information of External Assessor	Performance of contract between External Assessor and controller (GDPR Article 6(1)(b))	Identifying the user profile to give access to the Service, providing notifications and information to the user necessary to use the Service	
Information concerning company/institution External Assessor is associated with, as well as department/role of External Assessor	Performance of contract between External Assessor and controller (GDPR Article 6(1)(b))	Assigning External Assessor to correct controller and Learners in order to use the Service as intended	
Test/assignment questions	Performance of contract between External Assessor and controller (GDPR Article 6(1)(b))  Legitimate interests of controller (GDPR Article 6(1)(f))	Carrying out assessments (i.e. the core function of the Service)	
External Assessor's IP address, activity using the Service	Legitimate interests of controller/Worksee d (GDPR Article 6(1)(f))	Detecting and fixing errors and malicious behaviour in order to ensure the Service is available and working as intended  Anonymising certain personal data to create statistics concerning	

		Service usage and the general level of performance of Learners associated with a certain controller	
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#### Guest accounts

Category of personal data	Legal basis	Purpose of processing	Duration of processing
IP address, data on browser and device, events in the user interface (e.g. clicks and movement), time stamps	Legitimate interests of controller/Workseed (GDPR Article 6(1)(f))	The service uses CAPTCHA technology in order to identify automated bots in order to prevent abuses	Data is stored only as long as necessary to facilitate logging in to the service

## 4. Data transfers

For data subjects in the EU/EEA, the Service's servers will be hosted in the EU, and data will not be transferred outside the EU/EEA. However, personal data may be accessed (and therefore processed) from outside the EU/EEA in order to provide the Service. All transfers/processing of personal data outside the EU/EEA is carried out on the basis of an adequacy decision by the EU commission (GDPR Article 45), or subject to standard contractual clauses (GDPR Article 46), complemented by sufficient supplementary safeguards in order to ensure that the rights of data subjects can be fulfilled. You can request a copy of the standard contractual clauses, including a description of the transferred data, by using the contact details provided for Workseed above.

## 5. Rights of data subjects

Data subjects can exercise certain rights during specific circumstances under the applicable data protection legislation as follows:

- **Right to access and rectification:** You have the right to request access to the personal data relating to you. This includes e.g. the right to be informed whether or not personal data about you is being processed, what personal data is being processed, and the purpose of the processing. You also have the right to request that inaccurate or incomplete personal data be corrected.
- **Right to restriction of processing:** You are entitled to restrict the processing of personal data in certain situations.
- **Right to be forgotten:** You may also request that your personal data be erased if e.g. the personal data is no longer necessary for the purposes for which it was collected, the processing is unlawful, or the personal data has to be erased in order to comply with a legal requirement.
- **Right to Data Portability:** If personal data about you that you yourself have provided is being processed automatically with your consent or in accordance with a contract between you and the data controller, you may request that the data is provided in a structured, commonly used and machine-readable format and you may also request that the personal data is transmitted to another controller, if this is technically

feasible.

- You are also entitled, at any time, to lodge a complaint with the relevant supervisory authority if you consider that your personal data has been processed in contravention of applicable data protection legislation. The supervisory authority for Workseed's domicile is the Finnish Data Protection Ombudsman: <https://tietosuoja.fi/en/home>

## 6. Changes to the Privacy Statement

Workseed reserves the right to amend this Privacy Statement from time to time. Any changes will be posted on this page and, where appropriate, notified by e-mail. Please check back regularly to see any updates or changes to the Privacy Statement.

## 7. Use of non-personal data

Workseed also collects and processes data that does not directly or indirectly identify individual users. Furthermore, certain data is anonymised or collected into general statistics containing no personal data, which may then be used for developing Workseed goods or services, or analysing usage of the Service. In particular, Workseed uses cookies, more information concerning cookie practices can be found in the Cookie Statement: .

Last revised 24.6.2025.