

Information on the children taking part in early childhood education and their guardians is recorded in the national data warehouse for early childhood education and care Varda

The data warehouse for early childhood education and care (Varda) is a national data warehouse that contains information on ECEC actors and units, the children attending early childhood education and care, the children's guardians, and ECEC personnel. Provisions on the data warehouse are laid down in the Act on early childhood education and care (540/2018). The data stored in the data warehouse is used in performing the statutory official tasks, improving the efficiency of administration, developing early childhood education and care, making decisions, and in the evaluation, statistics, monitoring and research carried out in early childhood education and care. The data warehouse is maintained by the Finnish National Agency for Education.

Under the Act on early childhood education and care, city of Ylöjärvi have the obligation to record information on the children in Varda as from 1 January 2019 and the personal data of the children's parents or other guardians (hereinafter the guardians) as from 1 September 2019.

#### Processed personal data

The municipality, the joint municipal authority or the private service provider acting as the ECEC organiser records the following information in Varda about a child attending early childhood education and care:

- name, personal identity code, learner ID, mother tongue, municipality of residence and contact details
- the ECEC unit the child attends
- submission date of the application
- start and end dates of the decision or agreement
- scope of the right to early childhood education and care in hours and information on the use of this right
- indication that early childhood education and care is organised as non-standard hour child care
- the form in which early childhood education and care is organised

Some of the information has been collected from the child's guardians in connection with their application for a place in early childhood education and care, while some of it is recorded directly in Varda by the ECEC organiser. The following information on persons who have been entered in the Population Information System as guardians of children attending early childhood education and care is recorded in Varda:

- name, personal identity code, learner ID, mother tongue, municipality of residence and contact details
- the amount of the client fee for early childhood education and care and the value of a service voucher

- family size referred to in the Act on client fees in early childhood education and care
- start and end date of a payment decision

Information on those parents in the child's family who are not the child's guardians is not recorded in Varda. The learner ID is a permanent identifier issued by the Finnish National Agency for Education for individualising a person in the Agency's services. The learner ID of the child and the guardian is used for updating the information on citizenship, gender, mother tongue, municipality of residence and contact details from the Digital and Population Data Services Agency.

City of Ylöjärvi will transfer the information on the child attending early childhood education and care from the operational ECEC information system to Varda through system integration from 1.1.2019 and the data on the guardians as from 1.9. 2020.

#### Controllers

The Finnish National Agency for Education, municipalities, joint municipal authorities and private service providers act as controllers of Varda. The Data Protection Officer of the Finnish National Agency for Education is Jyrki Tuohela, tietosuoja(at)oph.fi. The Data Protection Officer of city of Ylöjärvi is Antti Pieviläinen, antti.pievilainen(at)ylojarvi.fi. The municipality, the joint municipal authority or the private service provider acting as the controller is responsible for recording the information in Varda and ensuring that the information is correct and up to date.

#### Disclosure of data

As a rule, the provisions on the disclosure of data laid down in the Act on the openness of government activities (621/1999) are not applied to the data warehouse. The information recorded in Varda may be disclosed for the statutory activities of the authorities. Information on the children is disclosed to the Social Insurance Institution of Finland as from 2020. In addition, personal data may be disclosed for the purposes of scientific research. An up-to-date list of the authorities to which information from Varda is disclosed for official tasks can be found at <https://confluence.csc.fi/pages/viewpage.action?pageId=78154135>.

Service providers participating in the maintenance and development of Varda (processors of personal data) have access to the personal data contained in Varda to the extent specified by the Finnish National Agency for Education.

#### Storage period of personal data

The information on the child and the child's guardians will be kept in the data warehouse until five years have elapsed since the end of the calendar year in which the child's right to early childhood education and care ended. The learner ID and the unique identification data based on which the learner ID has been issued will be retained permanently.

#### Data subject's rights

The child's guardian has the right to be informed about the processing of personal data of the child attending early childhood education and their own personal data and to have access to the personal data recorded in Varda (General Data Protection Regulation, Article 15), the right to rectify the information entered in Varda (Article 16) and the right to restrict the processing of the personal data (Article 18). In addition, the guardian of a child registered in Varda has the right to file a complaint with the Data Protection Ombudsman. More detailed instructions for the implementation of the rights are available in the privacy statement (in Finnish) at <https://opintopolku.fi/wp/tietosuojaseloste/varda-palvelun-tietosuojaseloste/>.

Further information:

- Informing of data subjects: <https://www.ylojarvi.fi/tietosuoja>
- National data warehouse for early childhood education and care Varda on the Finnish National Agency for Education's web service <https://www.oph.fi/varda> (in Finnish) and <https://www.oph.fi/sv/varda> (in Swedish)
- Privacy statement of the national data warehouse for early childhood education and care (in Finnish): <https://opintopolku.fi/wp/tietosuojaseloste/varda-palvelun-tietosuojaseloste/>
- Privacy statement of the learner ID register (in Finnish): <https://opintopolku.fi/wp/tietosuojaseloste/oppijanumeronrekisterin-tietosuojaseloste/>
- Act on early childhood education and care (540/2018): <https://www.finlex.fi/en/laki/kaannokset/2018/20180540>,
- <https://www.finlex.fi/fi/laki/ajantasa/2018/20180540> (in Finnish)