

Document publicity description for Aalto University Student Union (AYY)

Aalto University Student Union (AYY) is a public corporation under the Universities Act (558/2009). This is a document publicity description as defined in section 28 of the Act on Information Management in Public Administration (906/2019), designed to facilitate the submission of information requests to Aalto University Student Union.

Under the Act on the Openness of Government Activities (621/1999), everyone has the right of access to official documents that are in the public domain. In accordance with the Supreme Administrative Court's decision KHO:2024:4, the Act on the Openness of Government Activities applies to all of AYY's operations and documents. Its application is not limited to situations in which AYY exercises public authority in the performance of public administrative duties. Accordingly, AYY's documents are, for the most part, public. However, documents may contain confidential information, the confidentiality of which must always be based on law. In addition, the person concerned has the right of access to information concerning them.

AYY also publishes extensive information on its website to promote the implementation of the right of access to information.

The matter concerning an information request is decided by AYY's body or official in possession of the requested document. In practice, information requests are initially processed by AYY's official assigned to the matter and, where necessary, the matter is referred to the AYY Board for a decision. Information requests should be submitted using the contact details provided later in this document.

For the time being, AYY's datasets are not openly available through a technical interface. However, some documents, such as the Board's and the Representative Council's minutes and lists of decisions, are published openly on AYY's website.

Case register

AYY maintains information systems and registers relating to its activities, which can be used to search for and identify documents. Typical search criteria for documents include, for example:

- name of the body
- name or title of the document
- date
- year
- document type (agenda, minutes, appendix, memo, agreement)
- name of the case or project
- name of the person or organisation

Datasets

AYY holds datasets and documents relating to the following areas.

Decision-making bodies

AYY's key decision-making bodies are the Representative Council and the Board. In addition, special committees operate under them, as well as sections and committees composed of volunteers.

Documents generated as part of these activities include, for example:

- agendas
- minutes
- lists of decisions
- meeting appendices
- reports and memo materials

Minutes and lists of decisions are mainly public. However, documents may contain confidential appendices or sections containing personal data. In particular, meeting appendices and their background materials may contain personal data relating to applications or matters concerning individuals. Such information is assessed and, where necessary, redacted before the document is published online or released.

Student representatives in administration

The appointment of student representatives to the university's administrative bodies is the student union's statutory duty. Calls for applications are published on AYY's website and in the halloped.fi system. Applications are stored in the halloped.fi system and contain personal data. The public availability of applications and related documents is assessed on

a case-by-case basis in accordance with the Act on the Openness of Government Activities and the privacy legislation.

Membership and member services

AYY maintains a member register and information systems related to membership management.

These datasets include, for example:

- member register information
- documents relating to member services
- member communications
- materials relating to member benefits and services

Member register information contains personal data and is not public.

Community activities

AYY supports its associations and organisations, as well as maintains other community activities.

The related documents include, for example:

- grant applications
- association guidelines
- event-related documents
- volunteering materials

The documents are mainly public but may contain personal data or other confidential information.

Advocacy

The following documents, for example, are generated as part of the advocacy sector's activities:

- statements
- reports
- opinion pieces
- blog posts
- Transparency Register notices
- documents relating to interest groups

These documents are mainly public.

Communications

The following documents, for example, are generated as part of the communications sector's activities:

- releases
- online content
- posts
- photographs
- campaign material
- graphic material

These documents are mainly public. Copyright and access rights, however, may restrict the further use of the material.

Finances

Financial administration documents include, for example:

- budgets
- financial statements
- management reports
- accounting records
- documents relating to procurement

Financial statements, budgets, and management reports are public documents. Financial data may contain confidential information concerning private individuals or contracting parties, for example.

Human resources

Human resources documents include, for example:

- recruitment documents
- employment contracts
- employment relationship documents
- documents related to occupational health

Documents created as part of the recruitment process, such as calls for applications, are public. Documents containing personal data and other confidential information are generally not public or may only be released after the confidential parts have been redacted.

Tendering and contracts

As part of AYY's procurement and contract activities, the following documents, for example, are generated:

- calls for tenders and tendering documents
- offers
- procurement decisions and comparison memos
- supplier contracts and their appendices
- email communications relating to procurement

Procurement documents generally become public only once the contract relating to the procurement has been concluded. After the contracts have been signed, the documents may contain confidential information. Documents are released in part so that information regarded as the bidders' business secrets, such as unit prices and pricing breakdowns, is redacted by virtue of section 24, subsection 1, paragraph 20 of the Act on the Openness of Government Activities. Other grounds for confidentiality under the Act on the Openness of Government Activities may be applied in individual cases.

Housing operations

As part of AYY's housing operations, the following documents are generated:

- housing applications
- rental agreements
- documents relating to resident services
- housing instructions and guidelines

Applications, rental agreements, and resident information are not public. General guidelines and principles concerning housing operations are public.

Rental of facilities

AYY rents out event venues, meeting facilities, and club rooms.

As part of rental activities, the following documents are generated:

- rental agreements and their terms and conditions
- instructions

These documents are mainly public, but parts containing personal data are not public.

Real estate operations

Documents relating to AYY's real estate asset management are generated, for example, in connection with property maintenance, investments, renovations, and rental activities. Some real estate operations are managed through property companies owned by AYY. Property companies are independent legal entities and are not authorities referred to in the Act on the Openness of Government Activities. Information requests addressed directly to the property companies are therefore not subject to the Act on the Openness of Government Activities. Information requests concerning companies owned by AYY must be addressed to AYY. Documents concerning AYY's property companies that are in AYY's possession are mainly subject to the Act on the Openness of Government Activities when requested from AYY. Documents created in AYY's own decision-making or relating to real estate operations that are in the possession of AYY are therefore generally public unless there are legal grounds for their confidentiality. The application of the Act on the Openness of Government Activities is not limited to the performance of AYY's public administrative duty but extends to all of its operations. AYY's Executive Director and Chief Financial Officer provide further information on documents relating to real estate operations.

Student union archives

Material relating to the student union's performance of its public administrative duty and documents relating to decision-making are transferred to the student union archives. Other material describing AYY's activities is also transferred to the archives. The archives serve AYY's members, associations within AYY, and researchers.

Fees for archive services are charged in accordance with the payment grounds confirmed by the AYY Board, as described later in this document.

Please contact the archivist if your matter concerns the archives. You can contact the archivist at arkisto@ayy.fi.

Submitting an information request

Information requests concerning public documents must identify the requested documents sufficiently clearly for AYY to determine which document the request concerns. The request does not have to include the exact title or register number; it is sufficient that the subject matter or matter concerned is clear from the request. However, information requests that do not sufficiently specify the matter or are otherwise very

extensive do not meet the identification requirement under the Act on the Openness of Government Activities.

With the help of the directory, AYY assists the information requester in identifying the document they wish to access and seeks to clarify which documents contain the requested information. Information requests can be made informally. To speed up the processing of information requests, the request should identify the requested document as precisely as possible, using the document name, date, matter, the name of the body, or other similar search criteria. The information requester does not have to disclose their identity or justify their request unless this is necessary for AYY to exercise its discretion or to determine whether the requester has the right of access to the content of the document (section 13 of the Act on the Openness of Government Activities).

When requesting access to a confidential document, AYY's personal data register, or other document to which access may be granted only subject to certain conditions, the requester must, unless otherwise provided, state the purpose for which the information is to be used and provide any other information necessary to determine whether the conditions for access have been met and. Where necessary, the requester must also provide information on how the protection of the data is to be arranged (section 13 of the Act on the Openness of Government Activities). In such cases, AYY may ask the requester to disclose their identity and the grounds for requesting the information if this is necessary to determine whether the conditions for disclosure have been met, for example, to establish whether the matter concerns the person in question.

Information requests can be submitted verbally, in writing, or electronically. AYY does not require requests to be submitted using a specific form. Information requests should primarily be submitted using the following contact details:

- **By email:** Send your request to tietosuojavastaava@ayy.fi.
- **By mail:** Send a written request to Aalto-yliopiston ylioppilaskunta, Otakaari 25, 02150 Espoo.

AYY addresses information requests without delay and provides the requested information within two weeks of receiving the request. If the request concerns a large number of documents or requires confidentiality assessment or other special measures, the information must be provided within one month of receiving the request. In such cases, the requester is informed of the delay and the reasons for it (section 14, the Act on

the Openness of Government Activities). If AYY refuses to provide the requested information, in full or in part, the requester is informed of the reasons for the refusal and of the possibility of referring the matter to the AYY Board for resolution. The requester is asked whether they wish the matter to be referred to the Board and is provided with information on any fees charged for processing the request. A decision made by the Board concerning an information request may be appealed to the Administrative Court in accordance with the Act on Administrative Judicial Procedure (section 33 of the Act on the Openness of Government Activities).

AYY provides the requested information in the manner requested, where this is possible without causing unreasonable inconvenience. Information requests are generally responded to by email. If an information request concerns documents that are not in AYY's possession, AYY directs the information requester to the authority competent to address the matter.

Charges for disclosure of documents

In accordance with the Act on the Openness of Government Activities, no fee is charged in the following cases:

- the information concerning the document is provided verbally;
- the document is provided for reading or copying at AYY's office;
- a public document stored electronically is sent by email to the person requesting the information;
- an electronically stored document is sent by email to the party concerned;
- the disclosure of the requested document falls within the authorities' obligation to provide guidance, advice, or information.

Standard document requests

Standard document requests are delivered free of charge. Standard document requests refer to requests where the document is public in full or where redacting its confidential sections is straightforward. The documents must be identifiable and retrievable from the student union's document management system using the available document classification or a document identifier, or from an electronically maintained register using its search functions.

Document requests requiring special measures

Document requests requiring special measures refer to requests where the documents cannot be located through ordinary means. Requests are also considered to require special measures if reviewing the document or redacting confidential information from it requires more work than usual, or if the document request is exceptionally extensive.

Such situations may include, for example:

- the requested information is so old that it has not been stored electronically and must be searched for in separate archives;
- the requested information is contained in several documents from AYY's different sectors and cannot be located through a simple search of the data system;
- the document is extensive and contains several sections that need to be redacted or are confidential;
- an exceptionally large number of documents need to be partially redacted;
- the information request is not sufficiently specific and the document must be located manually across several registers or archives;
- retrieving the information requires special search, screening, combining, or printing measures in connection with automated data processing.

If the processing of an information request is estimated to be subject to a fee, the requester is informed in advance of the estimated cost and of the opportunity to specify or restrict their request.

Grounds for fees

The Student Union Board has decided on the fees charged for the disclosure of documents on 1.10.2026.

Information provided verbally, by email, or at AYY's office

Standard document requests are delivered free of charge.

Copies and printouts

- A4 copy or printout: **EUR 1 / page**
- A3 copy or printout: **EUR 2 / page**
- Minimum charge: **EUR 10 / invoice**
- Mailing and delivery expenses are charged according to the actual costs incurred.

For document requests that require special measures, in addition to the copying and delivery charges mentioned above, a fee will be charged for the time spent retrieving the information and reviewing any confidential information as follows:

- The first 30 minutes are free of charge.
- A fee of €30 will be charged for each subsequent commenced 30-minute period.