

# Privacy Notice – FinCEAL Plus BRIDGES Partnership Support Instrument grant applicant and FinCEAL Plus BRIDGES event registration databases

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## For what purposes will your personal data be processed and what is the legal basis for the processing?

The University of Helsinki, acting as coordinator for the Finnish University Partnership for International Development (UniPID Network) and FinCEAL Plus BRIDGES project, is committed to collecting and processing your personal data in a fair and transparent manner and in compliance with the law on the processing of personal data. This privacy notice outlines how the University manages your personal information in accordance with the data protection legislation.

The data subject has given consent to the processing of his or her personal data for one or more specific purposes, outlined below.

**1)** In the case of FinCEAL Plus BRIDGES Partnership Support Instrument grant applicants, their personal information is collected for evaluating the grant applications and awarding grants.

The personal information provided when completing the FinCEAL Plus BRIDGES Partnership Support Instrument online grant application form is stored in the FinCEAL Plus BRIDGES Partnership Support Instrument application secure database. The data will be processed by the University of Helsinki. Anonymized data may be transferred to third parties.

The purposes of processing the personal data are:

- managing and evaluating grant applications and paying grants to the recipients, as well as communicating about them, and
- complying with statutory obligations and authority guidelines.

The Legal basis for the processing in these cases: Performance of a contract or taking steps prior to entering into a contract. The processing of personal data contained is primarily based on a contract and related to the data subject applying for or receiving a grant, grant payment and the university making the necessary notifications to the relevant authorities. The controller has also a legal obligation, i.e. the grant awarder is obligated to notify the Finnish tax administration and the pension provider of the grant award and its recipient.

**2)** In the case of FinCEAL Plus BRIDGES event registration databases, the information is collected for registering the event participants and for communicating pertinent information.

Your personal data is processed to carry out event arrangements. Statistics can also be compiled of event participants. Contact information is used to send messages and notifications related to events and messages of similar upcoming events. The University of Helsinki can also use data for statistical purposes.

The processing of personal data is based on the data controller's legitimate interests. Article 6.1(f) of the EU General Data Protection Regulation (GDPR, 679/2016). Such legitimate interests exist because a meaningful and proper relationship is established between the data subject (participant) and the University of Helsinki as a result of a registration for a seminar, conference or event. This can be considered to be equal to a customer relationship. On the

basis of this, the University of Helsinki issues notifications of upcoming events.

If separate agreements are entered into regarding events, processing may also be based on article 6.1(b) of the GDPR, in which case processing is necessary for the performance of the agreement or in order to take steps prior to entering into the agreement.

In the case of activities subject to a charge, processing may also be based on statutory obligations (taxation, accounting) as defined in article 6.1(c) of the GDPR.

In case we request data regarding a person's dietary restrictions or allergies, a specific consent for allergies or special dietary requirement will be requested.

#### What personal data do we process?

1) In the case of the FinCEAL Plus BRIDGES Partnership Support grant instrument, the following information is collected: First & Last name, Title or position, Institution, Department or unit, Work address, Postal code, City, Work phone and Email address.

2) In the case of the FinCEAL Plus BRIDGES event registration, the following information is collected: First & Last name, Title or position, Institution, Department or unit, Work address, Postal code, City, Work Phone and Email address. In some cases, special dietary information may also be collected. This information is necessary for organizing and follow-up for events.

No personal information from other sources will be added to the personal information provided through the online registration form filled in by the data subject.

#### Who will have access to your data?

Employees of the UniPID coordination unit based at the University of Helsinki have access to the Partnership Support Instrument grant application data and event registration data. In addition, the employees of Nordenswan & Siirilä Ltd. who are responsible for the maintenance and technical support of the system have access to the database. However, the employees of Nordenswan & Siirilä Ltd. do not process the data as that is not a part of the maintenance and support role.

The database is accessed with a personal user ID and password.

#### Will your personal data be transferred outside the EU/EEA area? How are the transfers protected?

Your personal information is NOT transferred outside EU/EEA area.

#### For how long will your data be processed? Will the data be archived? (Retention periods)

The processing of personal data will be terminated and the associated identification data will be deleted as outlined below.

Grants: The controller shall keep information for at least six (6) years after the last instalment of the grant has been paid, or for a period defined in the university records management plan (TOS). The names and projects of grant recipients can be stored permanently for scientific and historical research purposes.

The personal data of rejected grant applicants are not processed for more than one (1) year as of the end date of the grant application period.

Book-keeping material: The controller shall keep book-keeping material for at least six (6) years after the accounting period has ended or for a period defined in the university records management plan (TOS).

Events: The information you provide when you register for an event will be kept for 6 months after the event has occurred. If you consent to stay in touch with us, essential information to communicate with you will be kept until you withdraw your consent.

### Withdrawal of consent

You have the right to withdraw the consent at any time. You can easily cancel your consent by sending an email to [unipid-info@helsinki.fi](mailto:unipid-info@helsinki.fi). Withdrawing your consent does not affect the processing actions taken before the consent was withdrawn.

### Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data which is processed by the University:

- to access the personal information the University holds about you. This is known as a Subject Access Request.
- right to erasure ('right to be forgotten') in some cases
- to correct inaccuracies or, where appropriate and taking into account the purpose for which we process your data, the right to have incomplete data completed;
- to have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest (e.g. when the University need the data for research);
- to object to the processing of your personal data for marketing purposes.
- to object to the processing of your personal data when that processing is based on specific criteria such as the public interest or other legitimate interests, unless we have compelling lawful grounds to continue;
- to restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period;

- to ask for the transfer of your data electronically to a third party;
- where the legal basis for us processing your personal data is your consent, to withdraw that consent at any time.

If you have any questions about your rights, you can contact the University's Data Protection Officer or the contact person of the database concerned.

#### How can you use your rights?

All requests for the rights of the data subjects must be submitted to the responsible unit, contact details available at the end of this document. To ensure identity, a signed form or proof of identity is required.

#### A general description of the technical and organisational safety measures

The University as a data controller will take appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or damage to personal data.

Traffic on the UniPID website is protected with the SSL certificate.

#### Contact details

##### Data Controller

As regards processing these personal data, the University of Helsinki is the data controller and takes over the responsibility from the Faculty of Agriculture and Forestry as a responsible unit.

##### Responsible unit

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##### Data Protection Officer

If you have any questions concerning data processing, please contact the University's Data Protection Officer, [tietosuoja@helsinki.fi](mailto:tietosuoja@helsinki.fi).

This privacy notice has been released and submitted to the data subject on **01.02.2021**.