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1. Data controller

Lapland University of Applied Sciences Ltd
Jokiväylä 11 C
96300 Rovaniemi, Finland

2. Data controller's representative

Ari Konu, Director of Administration, firstname.lastname@lapinamk.fi

3. Data controller's contact person

Riitta Alajärvi-Kauppi, firstname.lastname@lapinamk.fi

4. Data protection officer's contact information

Pirjo Kärki-Koskinen, Data Protection Officer
Jokiväylä 11 C
FI-96300 Rovaniemi
tel. +358 40 510 0365, tietosuoja@lapinamk.fi.

5. Purpose of processing personal data

Personal data is processed for the administrative purposes of **project activity**, for example in payment requests to financiers and its reporting, in lists of participants collected at events and meetings and in project activity. Personal data is also processed in the **communication and network functions** of stakeholders, such as in newsletter mailing lists and networking.

6. Legal basis of processing personal data

Such processing is based on the EU General Data Protection Regulation. The processing criteria are:

Project administration

The legal basis of processing is compliance with the data controller's statutory obligation

Main provisions:

- Universities of Applied Sciences Act 932/2014 and the decrees issued by virtue of it
- General Data Protection Regulation (EU) 2016/679 and its complementary national regulations, Act on the Openness of Government Activities 621/1999

Information about programme-specific regulations can be found, for example, on the websites of the following financiers

<https://www.rakennerahastot.fi/>

<https://www.maaseutu.fi/>

<http://www.interregnord.com/fi/>

https://eacea.ec.europa.eu/erasmus-plus_en

<http://www.cimo.fi/ohjelmat/erasmusplus>

<https://www.horisontti2020.fi/horisontti-2020/>

<http://www.interreg-npa.eu/>

<https://www.businessfinland.fi/suomalaisille-asiakkaille/palvelut/rahoitus/lyhyesti/>

<https://www.sitra.fi/>

In the administration of projects, we process, for example, the ESF personal data form and also data of a sensitive nature (ethnic origin and health information). In such a case, the criteria for processing are

the data subject's consent

the data controller's compliance with their statutory obligation

Provisions:

A binding obligation from the ESF Regulation 1304/2013 and the general regulation 1303/2013

Further information about the ESR Henkilö (ESF person) privacy policy

<https://www.eura2014.fi/hakija/esrheti?2>

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The legal basis of **communication and network functions** is the consent of the data subject.

7. Categories of personal data processed and their storage periods

Project activity processes necessary information in accordance with the funding programme

- A person's ID and contact information: name, personal ID number, address, email and telephone number
- For persons working in a project in connection with a payment request: name, job title, working hours, salary and employment information, organisation and reason for being fixed-term, secondary occupation, start and end date, employment contract, salary information, working hours information, interruptions, holiday information, amount of Kela refund
- ESF personal data form
 - Employment situation: possible duration of unemployment, status outside working life or information concerning being in work
 - Education: degree of education completed
 - Other background factors: foreign or minority background, disability, weakness of position in the labour market

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Also, in certain types of projects: person's assessment of their own working capacity and/or impacts of the project

Storage periods

Personal data is only processed for as long as is necessary for the achievement of one of the above-mentioned processing purposes. In project activity, the storage obligation in accordance with the funding programme is extensive and long-term. For lists of participants and reporting, documents concerning project implementation are documented and stored in the project organisation in accordance with the rules of the funding programme. The filing plan of Lapland UAS contains specifications concerning filing. If a longer period is required by Finnish law, such as the Accounting Act, it must be complied with.

Communication and network functions process the name and contact information of people, such as email addresses. The data is deleted from the register at the request of the data subject or once the email address in the register ceases to function.

8. Information systems used for the processing

At Lapland UAS, the processing of personal data concerning project activity uses the following information systems:

Email, encrypted email, 7 Zip (file-zipping software), Reportronic (project management system), P2P Basware (purchase invoice program), eOffice/InvoiceReady (filing), Lapland UAS' network disk, AGS (salary reporting system), WebTallennus (personal data system), Populus (travel expense reporting system)

Financiers' systems to which personal data is reported according to project type:

e.g. EURA2014, Min ansökan (Interreg North), eMS, Hyrrä (Rural development), EC Participant Portal, Business Finland online services, eMS (NPA programme), PROMAS ENI programme portal, EU PADOR, EU Home Affairs Funds, EUSA, EMDESK (H2020 and ECSEL) and Mobility tool (ERASMUS)

9. From where is the personal data needed for the processing obtained?

In project activity, data is obtained from existing registers, from the data subject themselves, from partner organisations

In communication and network functions, personal data is obtained from the data subject themselves based on their own notice, or from a newsletter subscription or training registration form.

10. Cookies

Cookies are used in browser-based information systems for processing personal data. A cookie is a small text file that the browser saves on the user's computer. Cookies are used for providing services, making it

easier to log in and facilitating service use statistics. Users can block cookies on their browser, but this may prevent the system from functioning properly.

Cookies are used in the processing of personal data:

- Yes, browser-based systems: WebTallennus, AGS, Populus, EURA2014, Min ansökan, eMS, Hyrrä, EC Participant Portal, Business Finland online services, eMS, PROMAS, EU PADOR, EU Home Affairs Funds, EUSA, EMDESK, Mobility tool
- No

11. Regular transfer and disclosure

Personal data is disclosed to financing organisations, to possible main implementing organisations and, if necessary, to an inspector and/or auditor outside the organisation.

Registered data about participants (ESF personal data) is neither used nor disclosed for any other purposes.

12. Data transfer or disclosure outside the EU or EEA and its basis

As a rule, personal data is not transferred but, under exceptional circumstances, can be transferred outside the EU and EEA if this is necessary for the appropriate execution of the purpose of processing the personal data, for example based on the requirements of the funding programme. Such a transfer is executed in accordance with the Data Protection Regulation and other applicable legislation. If no Commission decision about the sufficiency of an area's data protection is available, the University of Applied Sciences may use, for example, the standard contractual clauses of the Commission to guarantee the security of the transfer. If a Commission decision about the sufficiency of data protection exists, the University of Applied Sciences may also rely on that decision.

13. Principles of personal data protection

The data of data subjects is protected by usernames and passwords and by means of user roles, whereby each user may process only data to which he/she has a right. The data controller's own personnel log in by means of the AD service under the responsibility of the data controller, and any possible external parties authorised by the data controller (e.g. maintenance personnel) by logging into the register locally. Right of access is removed when the person logs off from the tasks for which they were granted the right of access. Logging into a financier's systems requires identification and the right of access to the project's personal data.

14. Automated decision-making

Automated decision-making is not done.

15. Rights of the data subject

Data subjects have the right to:

- * receive information about the processing of personal data
- * review data concerning them
- * request correction of their data

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- * demand the restriction of processing
- * demand the deletion of their data
- * request that the personal data they provided be transferred to another data controller
- * not to be subject to automatic decision-making without legitimate grounds

A data subject has the right to withdraw their previously given consent if the processing of personal data is based on the data subject's consent.

The data controller does not, however, have to delete your personal data if it is justifiably necessary to comply with the law.

To exercise their rights, data subjects can submit their request on a form that is available on the Lapland UAS website or contact the Lapland UAS Data Protection Officer.

Data subjects have the right to appeal to the Office of the Data Protection Ombudsman if they feel that the processing of their personal data has violated valid data protection legislation.

For advice and instructions in matters connected to the rights of data subjects, please contact the Data Protection Officer, whose contact information is provided in Section 4.