



20 October 2025

Privacy notice: Processing and payment of remunerations and expenses (persons outside RCF)

EU General Data Protection Regulation 2016/679, Articles 13 and 14

Controller	Name Address Email address Telephone	Research Council of Finland Hakaniemenranta 6, PO Box 131, FI-00531 Helsinki kirjaamo@aka.fi +358 295 335 000 (switchboard)
Controller's contact person	Email address Telephone	Remunerations: hehatiimi@aka.fi Travel: taloudenry@aka.fi +358 295 335 000 (switchboard)
Data protection officer	Email address Telephone	tietosuoja@aka.fi +358 295 335 000 (switchboard)
Purpose and legal basis of personal data processing	The Research Council of Finland is a central government authority in the Ministry of Education, Science and Culture's administrative branch whose statutory duty is to promote scientific research and research framework conditions as well as their utilisation by funding them and by participating in international cooperation, to act as an expert in the development and implementation of science policy, and to carry out other expert tasks assigned to it by the Ministry (Act on the Academy of Finland 922/2009). <u>Remuneration of members of RCF decision-making bodies</u> According to section 2, subsection 4 of the Government Decree on the Research Council of Finland (979/2009), chairs and members of the RCF Board and scientific councils and the Strategic Research Council (SRC) shall be paid a monthly remuneration that is determined by the Ministry of Education, Science and Culture. Chairs and members of subcommittees appointed by the Board and the Finnish Research Infrastructure Committee may be paid a remuneration for membership in a subcommittee. The RCF shall decide on the remuneration. According to section 2, subsection 4 of the Decree (899/2025) entering into force on 1 January 2026, chairs and members of the RCF Board and scientific councils and the SRC shall be paid a monthly remuneration that is determined by the Ministry of Education, Science and Culture. Chairs and members of subcommittees appointed by the Board may be paid a remuneration for membership in the subcommittee. The RCF shall decide on the remuneration. The purpose of the processing of personal data is the payment of remunerations to chairs and members of RCF decision-making bodies. The processing of personal data is necessary for compliance with a legal	



	obligation to which the controller is subject and for the performance of a task carried out in the public interest (Article 6.1 c and e of the General Data Protection Regulation). <u>"ePalkkio ja matka" service</u> Personal data are processed in connection with the processing of remunerations, travel expenses, daily allowances and travel allowances for persons outside the central government. When remuneration or travel expense claims are submitted to the RCF, the RCF acts as the joint controller of the "ePalkkio ja matka" service together with the Finnish Government Shared Services Centre for Finance and HR (Palkeet). Palkeet is responsible for the technical operation of the information systems required for the performance of the tasks and services and related matters, such as usability and data integrity, protection and storage. The RCF is responsible for other duties incumbent upon the controller, such as for informing the data subjects, and acts as a point of contact for the data subjects in relation to the exercise of their rights. The processing of personal data is necessary for compliance with a legal obligation to which the controller is subject (GDPR Article 6.1 c). <u>Privacy policy for the "ePalkkio ja matka" form (Palkeet website).</u> <u>M2 Blue system for travel claims and cost claims</u> The purpose of the processing is to approve, record and pay daily allowances, travel expenses, travel reimbursements and other expenses, as well as to manage user rights related to the use of the system. The RCF acts as co-controller with Palkeet for personal data stored in the M2 Blue system. Palkeet is responsible for the technical operation of the information systems required for the performance of the tasks and services and related matters, such as usability and data integrity, protection and storage. The RCF is responsible for other duties incumbent upon the controller, such as for informing the data subjects, and acts as a point of contact for the data subjects in relation to the exercise of their rights. For persons other than public officials, the processing of personal data is based on the consent of the data subject (GDPR Article 6.1 a). <u>Expert remuneration</u> Information on the processing of personal data in connection with the payment of remunerations to experts (reviewers) is provided in the RCF's <u>privacy notice</u> for research funding.
Description of personal data categories	The data subjects are recipients of remunerations. The personal data processed include name, personal identity code, address, bank details and tax information.



	"ePalkkio ja matka" service and M2 Blue system: the data subjects are travellers and remuneration recipients outside the RCF Administration Office. The personal data processed on the "ePalkkio ja matka" form include first names and surname, personal identity code, home address, postal code, city, country, telephone number, email address, bank account and tax information, and information related to the remuneration, expenses and travel. The personal data processed in the M2 Blue system include personal identification number, first names and surname, personal identity code, email address, country, bank details, telephone number, organisational information for travel expense accounting, M2 user ID, the person's travel, expense and driving data, information on the person's payment card and travel account purchases, user role, type of remuneration recipient, information on whether the person has limited tax liability, and possible tax identification number. Street address only for persons who do not have a Finnish personal identity code or whose address is abroad or who are subject to limited tax liability.
Recipients or categories of recipients of personal data	In connection with the payment of remuneration to members of decision-making bodies/other non-governmental recipients, personal data is disclosed to the income register, the Tax Administration, Keva, and the payer's and recipient's banks. "ePalkkio ja matka" service: Information related to the payment is transferred to the payer's and recipient's banks. Remuneration and compensation paid to individuals must be reported to the income register after each payment. In addition, data are disclosed to Visma for the purpose of providing services related to the maintenance and support of the M2 Blue system. M2 Blue system: Information related to the payment is transferred to the payer's and recipient's banks or other payers. Tax-free remuneration and compensation paid to individuals must be reported to the income register after each payment. Data are also archived in the Herkkä archive. The data are disclosed only according to the duties and permissions granted in Finnish legislation. The right of public access is regulated under the Finnish Act on the Openness of Government Activities (621/1999). Public documents are disclosed according to sections 13 and 16 of the Act. Even public documents may contain personal data, the disclosure of which has been restricted. Chapter 6 of the Act lays down the obligations of secrecy, and the documents of an authority that are to be kept secret are described in section 24. Chapter 7 of the Act stipulates derogations from secrecy (sections 26-30). Pursuant to section 26, subsection 1 of the Act, an authority may grant access to non-disclosable information if there is a specific provision on such access or on the right of such access in an Act or if the person whose interests are protected by the secrecy provision consents to the access. The disclosure of information contained in a



	non-disclosable document on behalf of an authority or for a task performed on behalf of an authority is governed by section 26, subsection 3 of the Act. Service providers have access to the data as required by set agreements.
Transfer of personal data to third countries and information on safeguards	Personal data will not be transferred outside the EU or the EEA.
Storage period for personal data or criteria for determining storage period	Remuneration of members of RCF decision-making bodies: The personal data form delivered to the RCF will be retained for the duration of membership. The archiving plan of the RCF contains more detailed provisions on archiving. The Finnish Archive Act (831/1994) regulates the archiving duties of authorities. Pay slips are stored in the Herkkä archive for 50 years. "ePalkkio ja matka" service: The storage periods for personal data are based on legislation that specifies the storage periods for accounting records. As a rule, the storage period is six or ten years. For data stored in the form template for reuse, the deletion period is six months. M2 Blue system: The storage periods for personal data included in the user register are based on legislation that specifies the storage periods for accounting records. The storage period for personal data is no longer than the storage period for the material processed by the data subject.
Sources of information when information has not been obtained from the data subject	The personal data are obtained from the data subject. The data used in the "ePalkkio ja matka" service originates from the Suomi.fi service used for identification and from the information entered by the data subject into that service.
Information on automated decision-making (incl. profiling)	The data will not be used for profiling and will not be subject to automated decision-making.
Rights of data subjects	<u>Right of access to personal data</u> The data subject has the right to obtain from the controller confirmation as to whether personal data concerning them are being processed, and, where that is the case, to obtain access to the personal data. On request, the controller shall provide a copy of the personal data undergoing processing.



"ePalkkio ja matka" service: If the data subject does not have the opportunity to access their personal data being processed, they may submit a request for access to the RCF.

The data subject has access to their own travel and expense data via the M2 Blue system. With regard to personal data other than that to which the data subject has access via the information system, the data subject may submit a request for access to the RCF.

If less than one year has elapsed since the data subject exercised their right of access, the RCF can charge a fee based on the administrative costs of providing the information.

Right to rectification

The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate and incorrect personal data concerning them.

To correct your data, please contact the RCF (see contact details under 'Controller's contact person').

Right to restrict processing

The data subject has the right to have the controller restrict processing if:

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data
- the processing is unlawful, but the data subject opposes the erasure of the personal data and requests the restriction of its use instead
- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims

"ePalkkio ja matka" service and M2 Blue system: If the data subject contests the accuracy of the personal data. In such cases, the processing will be restricted for a period enabling the controller to verify the accuracy of the personal data. The data subject submits the request with justifications to the controller's representative, whereupon the controller restricts the processing of personal data in the system. Processing is restricted by limiting access rights to personal data.

Right to erasure

This right does not apply if the processing of the data is necessary for compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Nor does the right apply, for example, where processing is necessary for archiving purposes in the public interest, or where the right to erasure is likely to prevent or greatly complicate such processing.

Right to data portability

This right does not apply if the processing of the data is necessary for compliance with a legal obligation.

Notification obligation regarding rectification or erasure of personal data or restriction of processing

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with GDPR Article 16 and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it. If the data subject wishes to obtain information about the recipients, they must submit a request to the controller's representative.

Right to lodge complaint with supervisory authority

Without prejudice to any other administrative or judicial remedy, every data subject has the right to lodge a complaint with a supervisory authority, in particular in the member state of their habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of their personal data infringes the General Data Protection Regulation. This right is without prejudice to other administrative appeal or legal remedies.

In Finland, the national supervisory authority is the Data Protection Ombudsman: tietosuoja@om.fi, tel. +358 295 666 700.