



13 October 2025

Privacy notice for RRF funding

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	Name Email address Telephone	Anna Kalliomäki, Senior Science Adviser anna.kalliomaki@aka.fi +358 295 335 241
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>RRF funding process</u> The RCF collects and processes personal data to implement the research funding process. The funding process consists of the processing and review of research funding applications, the preparation, implementation, monitoring and supervision of research funding decisions, the communication of positive funding decisions, the reporting of funded projects and the processing of payments. The RCF implements Finland's sustainable growth programme and acts as a funding authority as defined in section 3(5) of the Finnish act on the administration, supervision and inspection of the EU Recovery and Resilience Facility (537/2022, hereinafter referred to as the 'RRF Implementation Act'). According to section 6 of the Act, the task of the funding authority is to: 1) be responsible for tasks related to the granting of support in its field of activity 2) monitor the use of the support in accordance with section 12 of the Act and ensure that the information to be reported to the State Treasury on the use of the support, the achievement of the objectives set for it, and the monitoring and inspection of the	



support is comprehensive and accurate and meets the content requirements of the centralised information system

- 3) submit to the ministry responsible for the sector concerned, by the deadline set by the Ministry of Finance, a statement of confirmation from the management of the funding authority corresponding to section 4(1)(4) of the Act concerning the support it has granted and used itself
- 4) establish and maintain a description of the management and control system for the support granted and used by the authority
- 5) report crimes related to the use of RRF funds in accordance with the Act on the National Audit Office and other irregularities that the State Treasury may require to be reported to the Ministry of Finance, the government controller's office, the State Treasury, the relevant ministry, the National Audit Office, and the European Anti-Fraud Office.

Furthermore, pursuant to section 9 of the Act, the funding authority shall, in performing the aforementioned tasks, take due account of the protection of the European Union's financial interests. In order to protect the financial interests, the implementation of audit and control requirements is required under Article 22(2)(d) of Regulation (EU) of the European Parliament and of the Council establishing the Recovery and Resilience Facility (2021/241). The collection and use of personal data on beneficiaries, contractors, subcontractors, beneficial owners and beneficiaries is required in order to protect the financial interests.

The basis for processing personal data in RRF research funding is primarily compliance with legal obligations (Article 6(1)(c) of the EU General Data Protection Regulation 2016/679) and, in addition, the exercise of official authority (Article 6(1)(e)).

In addition, as a government aid authority, the RCF has a supervisory role under the Act on Discretionary Government Grants (688/2001) under which it must ensure appropriate and adequate control of the government grant by obtaining information on the use of grants as well as other information.

The RCF requires an audit to be carried out under certain conditions in its funding terms and conditions. The RCF may also decide to authorise another authority or an external auditor to carry out audits related to the payment and use of government grants in accordance with section 16 of the Act on Discretionary Government Grants. In auditing assignments, auditors act as data controllers with regard to the personal data they obtain in connection with the assignment. The RCF receives reports on the audits, which may contain personal data.

Personal data may also be processed in connection with other measures under the Act, such as suspension of payment, repayment, or recovery of grants paid. Personal data may also be processed in connection with the handling of reports of breaches of the funding terms and conditions.

Data production



	According to the performance agreement between the Ministry of Education, Science and Culture and the Research Council of Finland for 2024-2027, the RCF will produce high-quality data and analyses for use by ministries and higher education institutions to monitor the level of research, assess its impact and support decision-making. In addition, the RCF, as a public authority, must promote the transparency of its activities and, if necessary, draw up guidance, statistics and other publications as well as data on its services, decision-making practices and social conditions and their development in its field of activity (Act on the Openness of Government Activities (621/1999)). The RCF collects and processes personal data in order to meet its objectives and comply with its statutory obligations by producing high-quality science policy data and analyses, such as various statistics, for the use of various parties. In this respect, the processing of personal data is based on compliance with legal obligations (GDPR Article 6(1)(c)) and on the performance of tasks of general interest (GDPR Article 6(1)(e)). <u>Other purposes</u> Personal data may also be processed for archiving purposes (GDPR Article 6(1)(e)). Personal data may also be processed in connection with audits conducted by the National Audit Office of Finland. The audits are based on the Act on the National Audit Office (676/2000). The RCF may process personal data of the researchers it funds, for example, for awarding or presenting prizes and awards for scientific work. The processing of personal data for this purpose is described in a separate privacy notice. Personal data may also be processed in connection with the process for handling allegations of research integrity violations (RI process). The RCF complies with the RI guidelines 2023 and 2012 issued by the Finnish Advisory Board on Research Integrity. The processing is based on the performance of tasks carried out in the public interest (GDPR Article 6(1)(e)) or on legitimate interests (Article 6(1)(f)).
Description of personal data categories	The data subjects are funding applicants, persons working within funded projects, representatives of research organisations (e.g. commitment issuers, invoicers) as well as experts who participate in the review of applications, persons invited to act as experts, decision-makers, contractors, subcontractors and their beneficial owners as well as RCF officials. In connection with its research funding activities, the RCF processes the following personal data (the list is indicative only): <u>Sign-up to the RCF online services (* indicates obligatory information)</u>



- Personal details: surname*, first name*, gender*, nationality*, personal identity code (*when nationality = Finnish), date of birth*, preferred language*, current position*, telephone (mobile)*, other telephone
- Organisation details: organisation*, organisation, other*, institution
- Office address details: postal address*, country*
- Email address (also the user id*)
- Expertise: research fields, possible keywords
- CV: degrees (issuing organisation, degree, field, date), titles of docent (issuing organisation, field, date, additional details), professorships (issuing organisation, field, start date, end date).

Details about applying for funding

CV

- Personal details: surname (incl. previous surnames), first names, researcher id (e.g. ORCID, ResearcherID)
- Degrees: date, degree title, main subject/programme or equivalent, name of institution, issuing organisation and country
- Titles of docent: date, scientific discipline, university
- Details of current employment: start and end dates, title, employer, place of work, part-time work
- Research career stage
- Full-time student: educational institution, degree title, degree programme or equivalent
- Current secondary employment
- Previous work experience: previous employment, grant periods incl. longer-term visits abroad: start and end dates, position, employer/funder, part-time work
- Previous secondary employment and other positions and commitments relevant to the call
- Career breaks (optional information): family leaves, military or non-military service, other leaves of absence or career breaks, with dates
- Research funding and grants: significant research funding: start and end dates, type, funder and amount, role in funding application, name of principal investigator
- Research outputs
- Research supervision and leadership experience
- Teaching merits
- Awards and honours
- Other key academic merits
- Scientific and societal impact

Research plan

- Research team: names and educational backgrounds of researchers; tasks, roles and key merits of project staff
- Collaborators: key collaborators and their roles



- Lists of publications: name of author of publication, title of article or publication, and publisher

Other application parts

Other parts of the application, such as the merits and competencies of Academy Research Fellow applicants, mobility, public description and letter of cooperation, also contain or may contain personal data about the applicant or other persons.

Report

The RCF processes personal data contained in reports on funded projects, such as:

- Principal investigator: personal details/CV, see above
- People who worked on the project and thesis writers: name/ORCID, gender, year of birth, research field, research career stage, FTEs, employer
- Project-related visitors: name, nationality, research careers stage, duration of visit, organisation
- Publications: name of author
- Degrees: name, degree, year, research field
- Collaborators: name, type, research field, country

Payment applications

The following personal data are processed in connection with the processing of payment applications:

- Number of funding decision, description/title of research, recipient of payment
- FTE/person specification: name, nationality, gender, year of birth, level, hours, salary

Experts

In addition, the following personal data are processed for the purpose of paying remuneration to experts:

- Surname
- First name
- Gender
- Date of birth
- Finnish personal identity code or
- Foreign personal identity code or TIN (tax identification number)
- Home address
- Bank details (e.g. account number)

Other details

In the case of RRF funding, for both the contractor and subcontractors, the name (first name and surname or company name) and identifying information (date of birth or business ID) are collected (based on Article



22(2)(d) of the RRF regulation). If the contractor is a legal person, information on the beneficial owners of the legal person (first names, surnames, date of birth, start and end dates of role) must be collected in addition to the information mentioned above. For contractor and beneficiary data, the email address of the notifier is also collected.

In addition, pursuant to section 11 of the national RRF Implementation Act (537/2022), the RCF uses and processes information contained in the compliance reports prepared by the Grey Economy Information Unit when reviewing beneficiaries' payment applications. The compliance reports are compilations of key official data compiled by the Grey Economy Information Unit. The reports help authorities target and implement measures to combat the grey economy. They contain information on tax liability, taxes paid, any tax liabilities and tax adjustments, the fulfilment of employer obligations, such as pension, accident and unemployment insurance contributions, the fulfilment of customs obligations and any omissions, reports on other statutory obligations and compliance with them, reports on any omissions detected and their extent, information on possible grey economy activities, such as a reports on economic activities aimed at obtaining economic benefits by neglecting statutory obligations. The Grey Economy Information Unit collects and combines this information from various official sources, such as the Tax Administration, the Finnish Centre for Pensions, the Employment Fund, and Customs. The RCF uses the compliance reports to support the supervision in its capacity as funding authority.

In connection with the assessment of eligibility or an application for an extension of the funding period, the RCF may need to process non-disclosable information about the data subject, such as information concerning family leave. The data subject shall submit any health information necessary for the processing of the matter directly to the official handling the case (the presenting official). Health data are not stored in the online services or the case management system.

In connection with the supervision of the use of funds, personal data contained in audit reports, such as the names of persons working or who have worked on funded projects or information relating to their salaries, may be processed.

Personal data, such as salary information, may be processed in connection with the repayment, suspension of payment or recovery of government grants. In addition, in connection with the assessment of the adjustment of recovery (section 26 of the Act on Discretionary Government Grants), information concerning the financial position and circumstances of a natural person who has acted as a recipient of funding may be processed if they have submitted this information to the RCF.

Personal data may also be processed in connection with the handling of reports of breaches of the funding terms and conditions. A notification of a breach of the funding terms and conditions shall include the personal details of the person making the notification and, where applicable, the details of the principal investigator or the project to which the report relates or of persons employed in the project or collaborators. If the notification leads to further action, the RCF will



	consult with the parties concerned as part of the investigation process. The consultation process may include sending the original notification to the parties concerned. The information processed in connection with the handling of suspected violations of research integrity include the contact details of the person(s) reporting the suspicion, such as name*, email address* (*= mandatory information on the RI violation report form), address, telephone number, and title or profession, as well as information about the suspected person(s), such as name, email address or other contact information, function or position, and organisation. In addition, the data processed may include personal data contained in the funding application or personal data of persons who have worked on the funded project or acted as collaborators.
Recipients or categories of recipients of personal data	Experts (reviewers) and members of review panels process personal data in connection with the funding applications they are involved in reviewing. In international calls, the review process may be carried out outside the RCF in accordance with the agreement for the international network of research funders. The RCF's decision-making bodies process the personal data contained in applications in connection with the decision-making. Applicants (principal investigator/application's contact person) and sites of research will receive a notification of decisions made. 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 7 of the Act stipulates derogations from secrecy. 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. In addition, pursuant to section 26.2 of the Act on the Openness of Government Activities, the authority may disclose information concerning, for example, the economic status or business or professional secret of another person, information on a recipient of healthcare or social welfare, information on the private life of a person or comparable information that is secret under another Act, if access is necessary for the realisation of a private person's or some other authority's statutory duty of information or for the realisation of a payment or any other claim that is to be taken care of by the authority granting access. Pursuant to section 26.3 of the Act, an authority may also grant access to a secret document in order to carry out executive assistance and for the performance of a task that is commissioned by it or otherwise to be performed on its behalf, if such access is indispensable for the assistance or the performance of the task. For such tasks, access to secret information may be granted also if the



removal of the secret information is obviously not feasible owing to its large volume or for any other comparable reason.

In addition, in accordance with the procedure laid down in the Archives Act, information from an official document that has been archived and is classified as confidential may be disclosed for research or other acceptable purposes in accordance with section 27 of the Act on the Openness of Government Activities, unless the authority that transferred the document has stipulated otherwise. Unless otherwise provided by law, the RCF may also, unless otherwise provided in an act, on a case-to-case basis, grant permission to gain access to a secret document for purposes of scientific research, statistical compilations or the preparation of official plans or studies (Act on the Openness of Government Activities, section 28).

In addition, an authority may grant access to a secret document to some other authority, if the conditions laid down in section 29 of the Act on the Openness of Government Activities are met, and to a foreign authority or international institution if the conditions laid down in section 30 of the Act are met.

The RCF publishes on its website the name, title and organisation of the members of the decision-making bodies.

After funding decisions have been made, the RCF may publish on its website the names, titles and organisations of the members of the review panels and the individual experts, provided that they have given consent. Information on panel members is published on a panel-by-panel basis.

The RCF submits funding decision data on funded projects to the Ministry of Education, Science and Culture's national research information repository for publication in the online portal www.research.fi. See [Privacy notice for data subjects](#).

The RCF produces high-quality science policy data, analyses and statistics in such a way that individuals are not directly or indirectly identifiable from them. Data will only be disclosed for the purpose of producing data, analyses and statistics based on a separate agreement.

The Finnish Government Shared Services Centre for Finance and HR (Palkeet) processes the personal data contained in payment applications in connection with the processing of the requests. Palkeet processes personal data of experts in connection with the payment of remunerations.

Service providers have access to the data as required by set agreements. Valtori (Government ICT Centre) is responsible for the technical maintenance of the case management system.

Pursuant to section 12 of the RRF implementation Act (537/2022), as part of the monitoring and control of the use of funds, the RCF must store the following information (incl. personal data) in the information system it uses and, without prejudice to secrecy provisions, report it to the State Treasury:



- 1) information on applying, granting, payment, monitoring, termination of payment, recovery, audits, recovery and other follow-up measures, as well as information necessary for assessing and monitoring the implementation of the "Do No Significant Harm" principle referred to in Article 2(6) of the RRF regulation
- 2) information on the achievement of the interim targets and targets set out in the recovery and resilience plan
- 3) information referred to in Article 22(2)(d)(i) to (iv) of the RRF regulation
- 4) information on common indicators as referred to in Article 1(f) of Commission Delegated Regulation (EU) 2021/2106 supplementing Regulation (EU) 2021/241 of the European Parliament and of the Council establishing the Recovery and Resilience Facility (establishing common indicators and detailed elements of the recovery and resilience scoreboard)

In addition, the State Treasury shall be notified of any audits conducted pursuant to the aforementioned Act, and the audit reports prepared based on such audits shall be submitted to the State Treasury.

Section 13 of Act 537/2022 stipulates the right of national authorities to obtain information and the right to disclose information. The Ministry of Finance, other ministries, the State Treasury, the government controller function, and the funding authority shall, without prejudice to the provisions on secrecy, have the right to obtain, free of charge, from another authority or body performing a public task, information on the financial position of a natural person or legal entity acting as an applicant for or recipient of funding, and information on the restrictions on the granting and payment of funding referred to in sections 10 and 11, business and professional activities and funding granted to them from public funds, and other circumstances relevant to the funding, which are necessary for the performance of the tasks referred to in the Act.

The aforementioned authorities also have the right to obtain from each other, free of charge and without being prevented by secrecy provisions, information concerning the administration, applying, granting, payment, monitoring, supervision, termination, recovery and other follow-up measures of RRF funds and the aid granted from them, which is necessary for the requesting authority to perform the tasks referred to in the Act.

As a funding authority, the RCF may also disclose the information referred to in section 13 above, notwithstanding the provisions on secrecy, to other authorities, bodies performing public tasks, and institutions and bodies of the European Union bodies, and institutions of the European Union if the information is necessary for the performance of their statutory duties. This information may include personal data.

The information on beneficiaries, contractors, subcontractors and beneficial owners is stored in the system maintained by the State Treasury for monitoring and reporting on the implementation of



	Finland's Recovery and Resilience Plan. The State Treasury discloses the personal data to the European Commission, the Ministry of Finance and supervisory authorities upon request in accordance with sections 13 and 14 of the Act (537/2022). The processing of data for the RRP system is described in the State Treasury's privacy notice (in Finnish: EU:n elpymis- ja tukivälineen suunnitelman täytäntöönpano (RRP)). In addition, the party conducting the audit pursuant to section 15 of the Act (the controller function, the Ministry of Finance, another ministry, the State Treasury, and auditors authorised by them) has the right to inspect all information, reports, documents, information systems, recordings, other material and circumstances necessary for the inspection. In addition, as the funding authority, the RCF may audit funding recipients in accordance with sections 16–18 of the Act on Discretionary Government Grants and authorise another authority or an external auditor to carry out audits. Outside experts may assist in audits at the authority's request. For these purposes, the RCF may disclose the necessary information, including personal data. The data submitted to the National Audit Office for auditing purposes may contain personal data. In connection with the payment of remunerations to experts, personal data are disclosed to the income register, the Tax Administration, Keva, the local tax authority and the payer's and recipient's banks. In accordance with the RI guidelines, decisions concerning RI violations that contain personal data, along with their appendices, are disclosed to the parties involved, the investigation team, research ethics support personnel, the Finnish National Board on Research Integrity, the funder, and, at discretion, the employer of the suspect. The notification of an RI suspicion shall be submitted to the senior manager of the organisation where the suspected activity is taking or has taken place, or where the suspect is working or has worked during the acts.
Transfer of personal data to third countries and information on safeguards	As a rule, personal data will not be disclosed outside the EU or the EEA. Personal data may, on a case-by-case basis, be transferred to third countries outside the EEA if established international research funding collaboration requires it concerning certain international funding opportunities. Unless the third country is a country, region or sector declared as offering an adequate level of protection through a European Commission decision, adequate level of data protection is primarily secured by appropriate safeguards, such as a contract between public officials or the European Commission's standard contractual clauses. In exceptional circumstances, the transfer may also be based on a matter of public interest.
Storage period for personal data or criteria for determining storage period	Information and documents concerning government grants and stored in the government grant information database must be retained for ten years from the date of payment of the last instalment. Information and documents on decisions to reject a government grant application that are stored in the data repository shall be retained for five years after the decision is made (section 32 e of the Act).



	The RCF's archiving plan specifies the following storage periods (research funding and case management systems): applications and appendices of funded projects, review reports by review panels and individual reviewers, decision notifications: stored for ten years after the end of the project. In the case of projects that were not funded, the corresponding documents will be stored for five years after the decision. Projects reports are stored for ten years after the end of the projects. The minutes of the decision-making body are permanently stored in the case management system. The name of the applicant, the funding scheme, the site of research, the title of the project (research topic), the application number and the dates are permanently stored in the RCF case management system. Information requested for the payment of expert remunerations (see section Experts) will be removed from the system and will no longer be visible to anyone other than the expert themselves once the expert's role has ended. The archiving plan of the RCF contains more detailed provisions on archiving. The Finnish Archives Act (831/1994) regulates the archiving duties of authorities.
Sources of information when information has not been obtained from the data subject	When a user logs in to the RCF's online services (SARA) via the HAKA identification system, the user's name, personal identity code, host organisation, EduPrincipalName and email address are retrieved from the organisation. For payment purposes, the site of research shall provide the RCF with the following personal data: name, gender, year of birth, nationality, research career stage, hours worked, salary (working time and compensation paid in the project under the full cost model). Other personal data of persons working on or associated with the project (e.g. project staff receiving external funding, visits, publications, degrees obtained in connection with the project, collaboration and interaction partners) are obtained from project monitoring and reporting data. The principal investigator or a person authorised by the PI submits the research report. The information on the beneficial owners is collected from the information service of the Finnish Patent and Registration Office. The auditor's report is provided by the auditor. Information is also obtained, for example, from reports of breaches of the funding terms and conditions and from reports of suspected RI violations. Experts/reviewers are sought from a variety of sources, such as the public website of the organisation concerned, publication databases and scientific events.



	To support the research funding process, the RCF may utilise automatic data processing to compare the textual content of research plans and keywords describing the expertise of experts. In addition to the keywords provided by the applicant, the RCF may add supplementary keywords in the online services to assist in finding suitable reviewers for each application.
Information on automated decision-making	The RCF research funding process does not involve decisions subject to automated decision-making.
Right to object to the processing of data	If the RCF processes personal data for the purpose of carrying out a statutory task, the data subject does not have the right to object to the processing of the data. If the data is processed for the performance of a task carried out for reasons of public interest, in the exercise of official authority or for the purposes of the compelling legitimate interests pursued by the controller or a third party, the data subject has the right to object to the processing on grounds relating to their particular situation.
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. If less than one year has elapsed since the data subject exercised their right of access, the controller can charge a fee based on the administrative costs of providing the information. <u>Right to rectification</u> The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate and incorrect personal data concerning them. <u>Right to restrict processing</u> The data subject has the right to obtain from the controller a restriction of processing, for example when 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. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of an EU member state. <u>Right to erasure</u>



This right does not apply if the processing is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject or if the processing is carried out 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.

If you have requests concerning the rights of the data subject, please contact kirjaamo@aka.fi.

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.