



Privacy notice for research funding	
EU General Data Protection Regulation 2016/679, Articles 13 and 14	
Controller	Name Research Council of Finland Address Hakaniemenranta 6, PO Box 131 FI-00531 Helsinki Email kirjaamo@aka.fi Telephone +358 295 335 000 (switchboard)
Data protection officer	Email tietosuoja@aka.fi Telephone +358 295 335 000 (switchboard)
Purpose and legal basis of personal data processing	<p>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).</p> <p><u>Research funding process</u></p> <p>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. In this regard, the processing of personal data is primarily based on compliance with legal obligations (GDPR Article 6(1)c).</p> <p>For example, in international research funding cooperation, the RCF may act as a joint controller in the same funding call with one or more funding organisations. The controllers will then, as required by GDPR Article 26, define in a transparent manner their respective responsibilities for complying with the obligations laid down in the GDPR, in particular as regards the exercise of data subjects' rights and their duties to provide information in accordance with Articles 13 and 14, by means of an arrangement between them.</p> <p>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</p>



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)).

Other purposes

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



	<p>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)).</p>
<p>Use of tools based on machine learning and natural language processing</p>	<p>To support the research funding process, the RCF uses analysis and optimisation methods based on machine learning and natural language processing. These tools include topic modelling and historical sorting of the content of research plans, comparing the content of research plans with keywords describing the competence of the reviewers; and optimising the reviewers' reading responsibilities based on the results of this comparison and application-specific expert survey responses.</p> <p>The tools analyse application texts and produce recommendations and classifications and identify anomalies to support the work of RCF officials. The tools do not make funding decisions or other decisions that affect individuals. In all cases, final decision-making takes place by a person under official responsibility. The tools do not evaluate applicants' personal characteristics or perform profiling of individuals.</p>
<p>Description of personal data categories</p>	<p>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 and RCF officials.</p> <p>In connection with its research funding activities, the RCF processes the following personal data (the list is indicative only):</p> <p><u>Sign-up to the RCF online services</u></p> <ul style="list-style-type: none"> • 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). (* = mandatory information) <p><u>Details about applying for funding</u></p> <p>CV</p> <ul style="list-style-type: none"> • 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

Letter of collaboration

- Collaborator and position, organisation and country.

Other application parts

Other parts of the application, such as the merits and competencies of Academy Research Fellow applicants, mobility and public description of project, 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) or National Insurance Number
- Home address
- Bank details (e.g. account number).

Other information

In connection with the assessment of eligibility or an application for an extension of the funding period, the RCF may need to process nondisclosable 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.

The data processed in connection with the payment of personal grants include name, personal identity code, address and bank details.

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



	<p>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.</p> <p>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.</p> <p>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.</p>
Recipients or categories of recipients of personal data	<p>Experts (reviewers) and members of the review panels process personal data for the funding applications in which they participate in the review. 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.</p> <p>Applicants (principal investigator/person responsible for the application) and sites of research will be notified of decisions taken.</p> <p>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.</p> <p>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</p>



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-by-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 the Ministry's privacy notice for data subjects.](#)

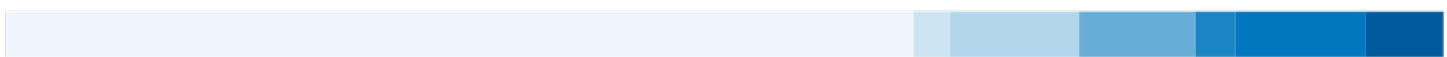
Decision data on all applications submitted after 1 October 2023 will be transferred to the government grant information database maintained by the State Treasury (Act on Discretionary Government Grants (688/2001), chapter 6a, especially sections 32a and 32b, and Government Decree on the minimum information to be stored in the data repository for government grant activities and on the datasets to be published in the service for publishing and using government grant information (1394/2022)). See privacy notice: [Processing of personal data in government grant services.](#)



	<p>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.</p> <p>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.</p> <p>In connection with the payment of personal grants, personal data are disclosed to the income register, the Tax Administration, the Farmers' Social Insurance Institution (Mela) and the payer's and recipient's banks. 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.</p> <p>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.</p> <p>At the request of the auditor, the RCF may make available material containing personal data for the purpose of carrying out audits of financial control for the use of those conducting the audit.</p> <p>The data submitted to the National Audit Office for auditing purposes may contain personal data.</p> <p>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. 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.</p>
<p>Transfer of personal data to third countries and information on safeguards</p>	<p>As a rule, the RCF does not disclose personal data 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.</p> <p>If a data processor or their subprocessor transfers personal data outside the EU/EEA, a level of data protection equivalent to EU requirements will be ensured in such transfers, as required by the GDPR.</p>



<p>Storage period for personal data or criteria for determining storage period</p>	<p>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 shall be retained for five years after the decision (section 32 e of the Act on Discretionary Government Grants).</p> <p>The minutes of the decision-making body are permanently stored in the case management system.</p> <p>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.</p> <p>The archiving plan of the RCF contains more detailed provisions on archiving. The Finnish Archive Act (831/1994) regulates the archiving duties of authorities.</p>
<p>Sources of information when information has not been obtained from the data subject</p>	<p>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.</p> <p>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).</p> <p>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.</p> <p>The auditor provides the auditor's report.</p> <p>Information is also obtained, for example, from reports of breaches of the funding terms and conditions and from reports of suspected RI violations.</p> <p>Experts/reviewers are sought from a variety of sources, such as the public website of the organisation concerned, publication databases and scientific events.</p> <p>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.</p>





Information on automated decision-making (incl. profiling)	The RCF's research funding process does not include decision-making or profiling based on automated processing.
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	<p><u><i>Right of access to personal data</i></u></p> <p>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.</p> <p>If less than one year has passed since the data subject exercised their right of access, the controller can charge a fee based on the administrative costs of providing the information.</p> <p><u><i>Right to rectification</i></u></p> <p>The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate and incorrect personal data concerning them.</p> <p><u><i>Right to restrict processing</i></u></p> <p>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. Restriction of personal data processing means that the data may, with the exception of storage, only be processed with the data subject's consent, for the protection of the rights of a natural or legal person, or for reasons of important public interest of the Union or of a Member State.</p> <p><u><i>Right to erasure</i></u></p> <p>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.</p>



If you have any requests concerning the rights of the data subject, please contact us at 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: tel. +358 295 666 700 (switchboard) or email tietosuoja@om.fi.