Privacy policy concerning research funding
(EU’s General Data Protection Regulation 2016/679, Articles 13 and 14)

1. Controller

Academy of Finland

2. Controller’s contact information

Hakaniemenranta 6
PO Box 131
FI-00531 Helsinki

Email: kirjaamo(at)aka.fi
Telephone number (switchboard): +358 295 335 000

3. Data Protection Officer’s contact information

Email: tietosuoja(at)aka.fi
Telephone number (switchboard): +358 295 335 000

4. Legal basis and purpose of personal data processing

The Academy 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. Additionally the Academy acts as an expert in the development and implementation of science policy, and to carry out other tasks assigned to it (Act on the Academy of Finland 922/2009).

The Academy of Finland collects and processes personal data to implement the research funding process. The funding process refers to the processing of funding applications and payments and to disseminating information on these. Personal data processing complies with statutory obligations (Finnish Data Protection Act 1050/2018, Article 6, paragraph 1, subparagraph c).

5. Data subject groups and personal data groups

The data subjects are funding applicants, Academy officials, representatives of research organisations as well as experts and decision-makers who participate in the review of applications.

The personal data processed in the Academy’s research funding processes include: name, personal identity number, organisation (with contact details and commitment issuers), email address, preferred language, citizenship, gender, title, telephone number, collaborators and research career stage.
Personal data is stored into the Academy of Finland’s electronic information systems, including the SARA system for online services (see the content management system’s privacy policy for SALAMA). Paper documents delivered or drawn up before 2012 are archived in the permanent archives located at the Academy of Finland.

6. Disclosure and recipients of personal data

The Academy of Finland may disclose personal data only within the limits imposed and allowed by current legislation. Public access to government documents and information is governed by the Act on the Openness of Government Activities (621/1999).

Public documents are disclosed upon request, in accordance with section 13 and section 16 of the Act. By default, anyone has the right to receive public documents and information from a public authority, even if they include personal data. However, personal data in the public authority’s personal data file can be disclosed in copy, printout or electronic form only if the transferee has the right to store and use these personal data in accordance with the regulations concerning personal data protection.

Additionally, a public document may contain confidential information or data whose disclosure is limited. This information or data may be personal data. Confidential information or data may be given access to or disclosed only with the consent of the person concerned, to the person concerned, or by virtue of a legal right to a third party, such as another public official.

If the data subjects have given their consent, the Academy of Finland may also publish information about persons who have received funding on the Academy’s website.

Service providers have access to the data as required by set agreements.

7. Transfer of personal data to a third country or an international organisation

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.

8. Planned deadlines for the deletion of different personal data groups

The archiving plan of the Academy of Finland contains more detailed provisions on archiving. The Finnish Archive Act (831/1994) regulates the archiving duties of authorities.

In the case of a funded project, the application documents (with appendices) and review reports by panels and individual experts will be stored for five years from the end of the research project. In the case of a project that was not funded, the corresponding documents will be stored for two years. Project reports will be stored for ten years and requests for payment for six years after the end of the project.
9. Data sources when data have not been obtained from the data subject

When a user logs in to the Academy of Finland’s online services (SARA) via the HAKA identification system, the user’s name, personal identity number and organisation are retrieved from the organisation.

10. Data subject rights

   Right of access to personal data

   The data subject has the right to obtain from the controller confirmation of whether personal data relating to them are being processed and, if these personal data are processed, the right of access to personal data. The controller must provide a copy of the personal data processed.

   If less than one year has elapsed since the right of access of the data subject was used, the controller will charge a fee based on the administrative costs of providing the data.

   Right to rectification of data

   The data subject has the right to demand that the controller rectify, without undue delay, any inaccurate and incorrect personal data of the data subject. The request should be submitted to the controller's contact person.

   Right to restrict processing

   The data subject has the right to obtain a restriction of processing from the controller, for example, in situations where the data subject contests the accuracy of the personal data or the personal data has been processed unlawfully. 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.

   Right to appeal to a supervisory authority

   Every data subject has the right to file a complaint with the supervisory authority, in particular in the Member State in which they have their usual residence or workplace or where the alleged infringement has occurred if the data subject deems the processing of personal data relating to them to infringe data protection legislation. This right is without prejudice to other administrative appeal or legal remedies. In Finland, the national supervisory authority is the Data Protection Ombudsman, tel. +358 295 616 670 or tietosuoja(at)om.fi.

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