

Archive of BONUS European Economic Interest Grouping (EEIG)

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

Privacy policy statement/Information for data subjects

Controller

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Controller's contact person

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Data protection officer

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Name of register

Archive of BONUS European Economic Interest Grouping (EEIG)

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, to act 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). Processing of personal data is therefore necessary for the authority to comply with this statutory obligation.



The BONUS EEIG closed operations at the end of 2021 and will be dissolved during 2022. The Academy of Finland will take over all BONUS EEIG materials and archives for preservation.

The material transferred to the Academy of Finland covers the statutory accounting and HR material, as well as material related to the management and operation of the EEIG, which must be retained for possible audits under agreements made with the European Commission concerning the BONUS programme and the BANOS CSA project.

The personal data contained in the register have been used to fulfil the employer's contractual and statutory obligations related to HR management as well as handle the project management in the programmes.

Data subjects and categories of personal data

The data subjects are BONUS staff members, collaborators and partners, and participants.

The categories of personal data for former employees are name, employee number, address, email address, telephone number, bank information, degree certificates, employment history, salary information, job applications and CVs. The data related to HR management include employment contracts, employment certificates, work-time tracking, annual holidays, pay receipts, absences, sick leave information, information related to parental leaves and other information related to the determination of benefits.

The register also contains financial information, such as the invoice archive, including purchase and travel invoices and payroll material, as well as financial statements.

The register also contains administrative and legal documents, such as minutes of the meetings of the steering group, decisions, appointments of member representatives, founding and accession treaties, internal rules, and agreements with service providers.

The project management documents include reports produced by the project, impact assessments, agreements, guidelines, minutes of project management group meetings, publications, and agreements with the European Commission and project financiers.

The documents relating to the BONUS programmes cover material related to funding calls and review of applications, such as call texts and guidelines, contracts, applications by funded projects and reviews thereof, and evaluation reports and minutes. In addition, the register includes project research plans, audits and Excel databases on projects and researchers participating in the projects.

These documents contain the personal data of the parties involved (e.g. name, professional title, contact details of the place of employment).

Recipients or categories of recipients of the personal data



The data are disclosed only according to the duties and permissions granted in Finnish legislation. The right of public access is regulated under the Act on the Openness of Government Activities (621/1999). Public documents are disclosed according to sections 13 and 16 of the Act. An official document may be secret if it has been so provided. Secret official documents are disclosed only on the grounds of consent of the data subject, to a party, or due to a legal right.

Transferring personal data to a third country or an international organisation

Data will not be transferred outside the European Union or the European Economic Area or to international organisations.

Period for which the personal data will be stored

The obligation to retain the material is based on Finnish legislation and agreements with the European Commission. All material relating to the BONUS programme and the BANOS CSA projects shall be retained for five years from the date of receipt of the final payment, in this case until the end of 2027. The storage period of the accounting data is 6–10 years, that is, at most until the end of 2032.

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.

From which source the personal data originate if not obtained from the data subject

The personal data are obtained from the data subject.

Rights of data subjects

Right of access to personal data

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. The request should be addressed to the contact person of the controller.

Provided that the data subject requests the above copy more frequently than once a year, the controller will charge a reasonable fee based on administrative costs.

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. The request should be addressed to the controller's contact person.

Right to restrict processing



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 a EU member state.

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.

In Finland, the national supervisory authority is the Data Protection Ombudsman, tel. +358 295 616 670 or tietosuoja@om.fi.