

5 November 2025

Privacy notice: Reporting a suspected violation of the terms for use of 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
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Data protection officer Email address <u>tietosuoja@aka.fi</u>

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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).

As a government grant authority, the RCF shall ensure appropriate and sufficient monitoring of the discretionary government grant by obtaining information on the use and monitoring of the grant and any other information and by carrying out audits as needed (Act on Discretionary Government Grants (688/2001), section 15).

The RCF may receive a report of a violation of the terms for the use of funding in an RCF-funded project. The RCF has a form that can be used to report such violations. The report can be submitted by a person working in the project, a representative of the site of research, or anyone else who has become aware of the matter. The report and the accounts submitted in connection with it may contain personal data about the person submitting the report and the subject of the report.

If the report leads to further action, the RCF will consult with the parties concerned as part of the investigation process. The consultation includes sending the original report to the parties concerned, who may then respond to it.

The report and response submitted to the RCF contain the personal data of the person who submitted the report and the author of the response included therein. In addition, as part of the investigation process, the RCF may request additional information from the parties concerned regarding matters that have come to light during the investigation.

If the RCF makes a decision on the matter, it will be communicated to the parties concerned.



	If the report leads to a payment suspension or recovery process, it will be subject to a separate privacy notice concerning the RCF's research funding.
	The processing of personal data is necessary for compliance with a legal obligation to which the controller is subject (Article 6(1)(c) of the GDPR) and for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6(1)(e)).
Description of personal data categories	The data subjects are the person who submitted the report and the subject(s) of the report.
	The personal data processed includes the surname, first name, telephone number, organisation, and email address of the person who submitted the report and the parties concerned, if this information has been provided in the report or in the responses submitted during the consultation. The report may also contain information about the project, including, for example, the first name, surname, job title and employer of the principal investigator.
Recipients or categories of recipients of personal data	If the report leads to further action, the RCF will consult with the parties concerned as part of the investigation process. The consultation includes sending the original report to the parties concerned, who may then respond to it. The report and response submitted to the RCF contain the personal data of the person who submitted the report and the author of the response included therein.
	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.
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	The reports and related responses are stored permanently. 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	Data on the subjects of the report are obtained from the person who submitted the report and, where applicable, from the parties concerned.
Information on automated decision-making (incl. profiling)	The RCF does not use automated decision-making or profiling in relation to suspected violations of the terms for the use funding.
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	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. 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. 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. 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



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.

Right to erasure

In certain situations, the data subject has the right to ask the controller to erase personal data concerning them without undue delay. This right does not apply, for example, 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 <u>kirjaamo@aka.fi</u>.

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.