

## **Privacy policy statement for Academy of Finland's 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@aka.fi](mailto:kirjaamo@aka.fi)

Telephone number (switchboard): +358 295 335 000

### **3 Data protection officer's contact information**

Email: [tietosuoja@aka.fi](mailto:tietosuoja@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 carries out other tasks assigned to it (Act on the Academy of Finland 922/2009).

As a government aid authority, the Academy of Finland has a supervisory role under the Act on Discretionary Government Transfers (688/2001) under which the Academy must ensure appropriate and adequate control of the government aid by obtaining information on the use of grants as well as other information on funding awarded.

The Academy of Finland collects and processes personal data to implement the research funding process. The funding process consists of the processing and review of research funding applications, preparation, implementation, monitoring and supervision of research funding decisions, communication of positive funding decisions, reporting of funded projects and processing of payments. Personal data processing complies with statutory obligations (GDPR Article 6(1)c).



In accordance with the performance agreement between the Ministry of Education, Science and Culture and the Academy of Finland, the Academy will work actively with key stakeholders to improve the quality and impact of research, education and innovation by providing high-quality science policy data and analyses to various parties and developing methods for assessing the impact of research and research activities, which will be made available openly to all. In addition, the Academy, 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 Academy of Finland 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)).

## **5 Data subject groups and personal data groups**

The data subjects are funding applicants, persons working within Academy-funded projects, 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, postal address and research career stage.

## **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. In addition,



the Academy of Finland may, with the consent of the data subject, disclose positive funding decisions to the national research information hub maintained by the Ministry of Education, Science and Culture and publish them on the hub's web portal at [research.fi/en](https://research.fi/en).

The Academy produces high-quality science policy data, analyses and statistics in such a way that individuals are not directly or indirectly identifiable from them.

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 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, host organisation, EduPrincipalName and email address are retrieved from the organisation.

For payment purposes, the site of research shall provide the Academy 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).

## **10 Rights of the data subject**

### **10.1 Right of access**

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 to access the 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.

#### 10.2 Right to rectification

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.

#### 10.3 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 establishment, exercise or defence of legal claims, for the protection of the rights of a natural or legal person, or for reasons of important public interest of the Union or a member state.

#### 10.4 Right to lodge complaint with 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@om.fi](mailto:tietosuoja@om.fi).

If you have any requests concerning the rights of the data subject, please contact us at [kirjaamo@aka.fi](mailto:kirjaamo@aka.fi).