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Purpose and legal basis of personal data processing	<p>Purpose of processing</p> <p>The Academy of Finland maintains an internal reporting channel, which allows people to safely report breaches related to the Academy's operations. The maintenance of the reporting channel is based on the Directive of the European Parliament and of the Council on the protection of persons who report breaches of Union law (EU 2019/1937) and on the Finnish Whistleblower Act (1171/2022). The Finnish Whistleblower Act entered into force on 1 January 2023. "Whistleblower" refers to a person who, in the course of their work, discovers a breach of European Union or national law. Reports can be made by persons employed by or in an official capacity at the Academy of Finland.</p> <p>Besides maintaining an internal reporting channel, the Academy also processes other reports made under the Whistleblower Act. For instance, the Academy receives reports made through the centralised external whistleblowing channel established by the Office of the Chancellor of Justice. The legal basis for the processing of personal data is the same for both channels.</p> <p>The Whistleblower Act is limited in scope. Whistleblower protection is applied to reports made about offences, infringements, abuses or other acts or omissions relating to public procurement, financial services, money laundering and the prevention of terrorist financing, product safety, transport safety, environmental protection, nuclear safety, food and feed safety, animal health and welfare, public health, consumer protection, protection of privacy and personal data, and network and information system security. In addition, the Act applies, for example, to violations of legislation and conditions on EU or national grants or state aid.</p> <p>Legal basis of processing</p> <p>In the case of reports falling within the scope of the Whistleblower Act, this constitutes a processing ground within the meaning of Article 6(1)(c) of the General Data Protection Regulation, as the processing of personal data is necessary in order to comply with the controller's statutory obligation.</p>

	<p>The personal data contained in all reports made through the reporting channels as well as personal data disclosed during the investigation of the reports are used to examine and prevent possible misuse.</p>
Data contents	<p>You can submit a report via the Academy's internal channel anonymously or under your own name. Reports made via the external channel maintained by the Office of the Chancellor of Justice must be made under your own name. The report is always treated confidentially, and the identity of the whistleblower is known only to persons designated to process the report and to persons invited to examine the matter as experts.</p> <p>Typically, the reports may include personal data, such as the name and contact details of the whistleblower, the person subject to the report and other persons involved, such as witnesses.</p>
Regular sources of data	<p>The data are collected from the reports made via the reporting channels and, in the context of examining the subject of the report, from data sources within the Academy of Finland, such as persons who may be involved and, where necessary, using information from IT systems.</p>
Disclosure of data	<p>The appointment of persons and experts responsible for processing reports at the Academy, in accordance with sections 14 and 20 of the Whistleblower Act, is decided separately. In addition, in terms of case management and archiving, the Director of the Division of Information Management and the administrators of the case management system at the Academy process the reports in the course of their work. New persons will be appointed to replace designated handlers if they are prevented from processing reports, for example due to absence or disqualification. The appointment of experts necessary to verify the accuracy of the reports is decided on a case-by-case basis.</p> <p>Under the Whistleblower Act, a person appointed to process a report may provide information on the identity of the whistleblower and other persons mentioned in the report and any other information that directly or indirectly indicates the identity of the whistleblower in order to establish the accuracy of the report to a designated other person, if the provision of such information is necessary to establish the accuracy of the report. In addition, they may provide equivalent information if it is necessary for the competent supervisory authority to establish the accuracy of the report, for a pre-trial authority to prevent, detect, investigate and prosecute offences, for the prosecutor to perform the duties laid down in section 9 of the Finnish Act on the National Prosecution Authority (32/2019), or to draw up, present or defend a legal claim in court proceedings, out-of-court judicial proceedings or administrative proceedings. The person responsible for processing the report at the Academy of Finland informs the whistleblower in advance of the disclosure of their identity, unless such information endangers the verification of the accuracy of the report, the pre-trial or the trial.</p> <p>The technical platform for the internal reporting channel is based on a service provided by the company Webropol Oy. Webropol employees will not have access to reports in the channel without the explicit consent of the Academy of Finland. Webropol's general privacy statement is available as a PDF download at https://webropol.com/wp-content/uploads/2019/06/Webropols-Privacy-Statement.pdf.</p>

	The external reporting channel is maintained by the Office of the Chancellor of Justice. The Office of the Chancellor of Justice has a separate privacy policy statement that describes how the Office processes personal data.
Regular disclosure and transfer of data outside the EU or the EEA	Data will not be disclosed to other parties except in cases mentioned under section 7 nor will data be transferred outside the European Union or the European Economic Area.
Protection principles	<p>The register is handled with due diligence, and the data processed through information systems are appropriately protected. The Academy of Finland instructs to submit reports via the internal and the centralised external channel, but any reports received by letter or email are protected in a manner similar to those provided through the online channels. The controller shall ensure that the data stored are treated in a confidential way.</p> <p>Access to data processed in the Academy's information systems is restricted to persons separately designated and authorised by the controller. The access rights are regularly checked. The information systems in which the register is located are protected by technical measures.</p>
Data retention period, criteria to determine the period	<p>Data received through the reporting channels shall be deleted five years after the arrival of the report, unless their retention is necessary for the exercise of the rights or obligations laid down in the Whistleblower Act or any other act, or for the preparation, presentation or defence of a legal claim. Personal data that would be clearly irrelevant to the processing of the report shall be erased without undue delay.</p> <p>The data on the whistleblower shall be deleted from the internal reporting channel system no later than after the report has been processed and the whistleblower has been informed of the measures to be taken based on the report. Data necessary for a longer period will be stored in the Academy's case management system. Webropol Oy will store backup copies from the internal reporting channel for two weeks. Necessary log data will also be stored. Data removed from the system by users will be permanently removed from the Webropol system within one month.</p>
Information on automated decision-making and profiling	Data will not be used for automated decision-making or profiling.
Right to audit	The data subject's right of access to data referred to in Article 15 of the General Data Protection Regulation may be restricted in respect of personal data reported under the Whistleblower Act, if this is necessary and proportionate to ensure the accuracy of the report or to protect the identity of the whistleblower. If only part of the data on the data subject is such that they are not covered by the right referred to above, the data subject shall have the right to access other the data relating to them. The data subject has the right to be informed of the reasons for the restriction and to request that the other data be provided to the Data Protection Ombudsman in accordance with section 34(3) and (4) of the Data Protection Act (1050/2018).
Right to rectify and erase data	In respect of reports of violations within the scope of the Whistleblower Act, the data subject has only a limited right to access data concerning with them (see section 12 of this privacy policy). If such data concerning the data subject can be disclosed to the data subject without compromising the processing and examination of the report, the data subject may request rectification or erasure of the data. The request shall be submitted to the Academy of Finland's Registrar's Office at kirjaamo@aka.fi .



Right to object to the processing of data	With regard to reports covered by the Whistleblower Act, the Academy of Finland processes personal data for the purpose of carrying out a statutory task. The data subject therefore does not have the right to object to the processing of the data.
Right to restrict processing	The right to restrict processing does not apply to the processing of personal data referred to in the Whistleblower Act.
Right to lodge complaint	The data subject has the right to lodge a complaint with the supervisory authority if they feel that their rights have been infringed by the controller and that the controller has not reacted to the matter. The rights of the data subject are described at https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman .
Other rights	Personal data are not used or disclosed for use outside any fully necessary statutory official activity. Clients may notify the Academy of Finland by email of any data protection risks or data protection problems they have detected: tietosuoja@aka.fi .
Use of cookies	Webropol Oy only uses cookies that are required for the use of the service, and they are not used for other purposes. The Academy of Finland's cookie policy is available at https://www.aka.fi/en/contacts/data-protection-in-the-academy-of-finland/ .