**Data controller**

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**Personal data file**

**ERC Proposal Reading Day: letter to ERC grantees and applications submitted to the Academy of Finland**

**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).

The Academy of Finland acts as Finland’s National Contact Point (NCP) for Horizon Europe together with Business Finland. The National Contact Point (NCP) responsibilities are divided between the Academy and Business Finland. The Academy has the main responsibility for Horizon Europe Pillar 1, Excellent Science, which includes the European Research Council (ERC). NCPs provide information, advice and training for potential applicants and their sites of research throughout project lifecycles.

One form of training is the ERC Proposal Reading Day, when researchers planning to apply (primarily) and research support staff assisting them at sites of research get access to previously funded ERC applications. These applications are requested from volunteer researchers who have received ERC funding to a Finnish site. The processing of personal data is based on consent. The plan is to organise 1–3 Proposal Reading Days a year, using the same applications.

The data will not be used for profiling and will not be subject to automated decision-making.

**Data subjects and categories of personal data**

The data subjects are researchers who since 2014 (the beginning of the Horizon 2020 Framework Programme) have received ERC Starting Grant, Consolidator Grant or Advanced Grant funding to a Finnish site or research and who are contacted by the Academy by email concerning the possibility of submitting their applications to the ERC Proposal Reading Day. As a rule, the letter will be...
The personal data contained in the register are: 1) the recipient’s (grantee/researcher) email address that was used to send the letter, and 2) the name of the grantee, the site of research, the call from which the application was funded; the panel in which the ERC application was reviewed and the title of the application, if the grantee submits the application to the Academy to be used at the ERC Proposal Reading Day. In addition, the applications submitted may contain other personal data insofar as they have not been deleted in advance from the applications submitted to the Academy.

**Recipients or categories of recipients of the personal data**

The data recipients are Proposal Reading Day participants: researchers who are planning to apply for ERC funding and who are based at Finnish sites of research as well as research support staff assisting the researchers at the sites. The participants will register for the event in advance and sign a non-disclosure agreement upon arrival.

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. 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 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**

Applications submitted for ERC Proposal Reading Days will be kept in paper form in the archives of the Academy of Finland and electronically for a period of five calendar years, unless the data subject withdraws their consent before that. The written letters of consent (emails) of the researchers who submitted their applications will also be stored electronically in the same place as the applications for five calendar years. The period is calculated from the beginning of the calendar year following the submission of the applications.

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.

The personal data (name and email address) have been retrieved from the researchers’/universities’ websites and from the Academy’s own client register (SARA).

**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 data subject contests the accuracy of the personal data, 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 an EU member state.

**Right to erasure**

The controller is obliged to erase personal data without undue delay if the data subject withdraws the consent on which the processing was based and if there is no other legal reason for the processing.

**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: tel. +358 295 666 700 (switchboard) or tietosuoja@om.fi.