

Privacy policy statement for Academy of Finland RRF funding

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Name of register	Privacy policy statement for Academy of Finland RRF funding
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 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 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 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)).

The processing of personal data concerning beneficiaries and contractors, subcontractors and beneficial owners is based on the Finnish act on the administration, supervision and inspection of the EU Recovery and Resilience Facility. The purpose of the processing is to comply with obligations taken on to protect the financial interests of the European Union. The protection of financial interests requires the implementation of checks and controls concerning the names of the final beneficiaries, contractors and subcontractors of the funds and information on the beneficial owners of the final beneficiaries and contractors. The processing of personal data is in accordance with Article 6(1)(c) and (e) of the EU General Data Protection Regulation (EU 2016/679) (processing is necessary for compliance with a legal obligation to which the controller is subject and for the performance of a task carried out in the exercise of official authority vested in the controller).

Data subjects and categories of personal data

The data subjects are funding applicants, persons working within Academy-funded projects, Academy officials, representatives of research organisations, reviewers and decision-makers, contractors and subcontractors and their beneficial owners.

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.

For both the contractor and subcontractors, the name (first name and surname or company name) and identifying information (date of birth or business ID) are collected. If the contractor is a legal person, information on the beneficial owners of the legal person must be collected in addition to the information mentioned above.

Recipients or categories of recipients of the personal data

The Academy of Finland may disclose personal data only within the limits imposed and allowed by current legislation. The right of public access is regulated under the Finnish 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 may also publish information about funding recipients on the Academy's website. In addition, the Academy 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 www.research.fi.

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.

<p>The information on beneficiaries, contractors, subcontractors and beneficial owners is stored in the system maintained by the State Treasury for monitoring and reporting on the implementation of Finland's Recovery and Resilience Plan. The State Treasury will disclose personal data to the European Commission, the Ministry of Finance and the supervisory authorities upon request in accordance with Articles 13 and 14 of the act on the administration, supervision and inspection of the EU Recovery and Resilience Facility. The processing of data for the RRP system is described in the State Treasury's privacy policy (in Finnish: EU:n elpymis- ja tukivälineen suunnitelman täytäntöönpano (RRP)).</p>	
<p>Transferring personal data to a third country or an international organisation</p>	<p>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.</p>
<p>Period for which the personal data will be stored</p>	<p>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.</p> <p>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.</p>
<p>From which source the personal data originate if not obtained from the data subject</p>	<p>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</p>

	<p>and email address are retrieved from the organisation.</p> <p>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).</p> <p>The information on the beneficial owners is collected from the information service of the Finnish Patent and Registration Office.</p>
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.

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.

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. 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.

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,



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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. +358 295 616 670 or tietosuoja@om.fi.

If you have any requests concerning the rights of the data subject, please contact us at kirjaamo@aka.fi.

