

07/09/2022

# Privacy policy statement for strategic research (EU's General Data Protection Regulation 2016/679, Articles 13 and 14)

## 1. Controller

Academy of Finland  
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FI-00531 Helsinki  
kirjaamo@aka.fi  
tel. 029 533 5000

## 2. Data protection officer

tietosuoja@aka.fi

## 3. 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). The Strategic Research Council (SRC) is an independent body established within the Academy of Finland tasked with providing funding for long-term and programme-based research that is aimed at finding solutions to the major challenges facing Finnish society.

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, processing of payments, reporting of funded projects and assessing their impact. 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 strategic research programmes funded by the SRC carry out active [programme activities and cross-programme activities for societal impact](#) aimed at promoting the societal impact of strategic research beyond project and programme boundaries. These activities focus on the creation of connections between researchers and knowledge users. Also, the SRC, programme directors, programmes, projects, and the Division of Strategic Research jointly develop methods to strengthen dialogue between science and societal decision-making and to build better conditions for the societal impact of research. Such methods include information packages, meetings with policymakers and the website [ratkaisujatieteesta.fi](http://ratkaisujatieteesta.fi). The Academy of Finland also processes personal data in the programme and impact activities of strategic research. 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)).

#### **4. Data subject groups and personal data groups**

The data subjects include persons applying for research funding, persons working in funded research projects, other persons working in close connection with funded projects (e.g. project visitors and thesis workers), key project collaborators and interaction partners, Academy officials, representatives of research organisations and experts and decision-makers involved in the review of applications.

In the case of applicants, the personal data processed include name, personal identity number, organisation (with contact details and commitment issuers), email, preferred language, citizenship, gender, title, telephone number, postal address, and research career stage.

In addition to the above, the following personal data are processed concerning persons working on the projects and other persons in close connection with the projects: working months on the project, salary paid from the project, visits related to the research work of the project, degrees obtained within the project, significant new research funding advancing the research of the project, information on the person's participation in the work of committees, councils and working groups promoting the impact of the research of the project and in other expert work.

The following personal data are processed on the most important collaborators and interaction partners in the projects: name, organisation, position, telephone number and email address.

## **5. Disclosure and recipients of personal data**

In addition to Academy staff, SRC-funded programme directors of strategic research participate in the processing of personal data. Project follow-up data containing personal data are stored in a secure workspace managed by the Academy, accessible to Academy staff and programme directors. Each programme director's access to the workspace is maintained during the director's funding period. Programme directors can make use of the personal data in cross-programme activities for societal impact. They are not entitled to disclose personal data to third parties without the consent of the persons concerned.

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 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 funding recipients 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 <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.

## **6. Transferring personal data to a third country or an international organisation**

Personal data will not be transferred outside the European Union or the European Economic Area or to international organisations.

## **7. 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.

## **8. From which source the personal data originate if not 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 code, host organisation, EduPrincipalName (identifier) 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).

Other personal data on project participants (visits related to the research work of the project, degrees obtained within the project, significant new research funding advancing the research of the project, participation in the work of committees, councils and working groups promoting the impact of the research of the project and in other expert work) can be obtained from project monitoring and reporting data compiled by the project consortium PI or a person authorised by

the PI (often the coordinator) from the data subjects and submitted to the funder at regular intervals. The personal data on the project's main collaborators and interaction partners can be obtained from the project's final report, the content of which is the responsibility of the project consortium PI.

## **9. 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, 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(at)om.fi, tel. +358 295 666 700.

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