

Privacy notice: processing of personal data in research, development and innovation activities

This is a privacy notice, which is based on articles 13 and 14 of the EU's General Data Protection Regulation.

Data Controller

Turku University of Applied Sciences Ltd

Joukahaisenkatu 3

20520 Turku, Finland

Telephone exchange +358 (0) 2 263 350

kirjaamo@turkuamk.fi

Person in charge and contact persons

Paula Ailio, Head of Project Management Office

Contact information of the Data Protection Officer

Harri Kilpiö, Data Protection Officer (Turku UAS),

telephone number: +358 (0)50 5985 830

Please contact in all data protection related matters: tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing the personal data

The personal data is processed in research, development and innovation activities (RDI). Personal data needs to be processed especially in projects, at all stages of their lifecycle: in creating funding applications, in the practical implementation of projects, research work, reporting and archiving. The

purpose of processing personal data is always the implementation of the project or research in question.

The controller of the project and the processing of personal data related to the project are always defined for each project and described in the project's own privacy notice.

Legal basis for processing personal data

In RDI activities, personal data is processed for several different purposes. Hence, the legal basis for processing changes according to the purpose.

Possible legal bases include, for example:

- Processing related to RDI activities is necessary for the purposes of legitimate interests (General Data Protection Regulation, Article 6, paragraph 1, subparagraph f), such as fulfilling the duties of a university of applied sciences and participation in national and international RDI activities.
- The processing may be based on the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (General Data Protection Regulation, article 6, paragraph 1, subparagraph e), such as scientific or historical research.
- RDI activities are a statutory task of universities of applied sciences (Act on Universities of Applied Sciences 932/2014, Section 4). Hence, the processing may also be based on complying with a legal obligation (General Data Protection Regulation, article 6, paragraph 1, subparagraph c). Such obligations include e.g. duties related to financial administration.
- In individual studies related to RDI activities, the processing may also be based on consent (General Data Protection Regulation, article 6, paragraph 1, subparagraph a).



More information on the legal basis is available in project-specific privacy notices.

Legitimate interests of the data controller or third party

The legitimate interest of Turku UAS: Processing related to RDI activities is necessary for the purposes of legitimate interests (General Data Protection Regulation, Article 6, paragraph 1, subparagraph f), such as fulfilling the duties of a university of applied sciences and participation in national and international RDI activities.

Processed categories and storage times of personal data

In RDI activities, for example data on people participating in RDI projects is processed, as listed below. The people participating in RDI activities and the data differ case by case. The people may be e.g. staff or students of Turku UAS, company representatives or representatives of project cooperation partners.

The personal data processed in RDI activities mainly includes:

- name
- date of birth
- contact information
- employer
- work experience
- occupation
- title
- employment status
- education
- other merits
- salary

- gender
- marital status

The storage time of data processed in projects and studies is case-specific and is often defined by the financier's demands. Typically, the storage time is a couple of months in the preparation of funding applications and in project implementations several years, in practice often approx. 10–20 years. Some of the information has to be archived permanently. The project's data privacy notice contains more specific information on the storage time.

Regular information sources

The personal data in RDI activities is mainly received from the data subjects themselves. On a case-by-case basis, data may also be requested or received from the employer or other representative of the data subject. In single projects and studies of an RDI project the information sources are always case-specific.

Receivers or receiver groups of personal data

The personal data is received by our cooperation partner...

To perform RDI activities and the related financial administration, the processors of the data within Turku UAS are:

- the persons in charge of the project
- Project Management Office (PMO)
- financial services
- research groups and researchers
- heads of education and research
- the administrators of the information systems related to the activities
- the faculties' RDI coordinators



On a case-by-case basis, the information is also disclosed outside TUAS, for example to:

- financiers, so that they can monitor the project's progress and fulfilment of the funding conditions,
- project partners, so that they can participate in joint projects, manage the project activities and carry out tasks related to the project,
- for inspectors and auditors, so that they can inspect documents related to the project's progress and to oversee the appropriate financial administration.

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

Partners (other higher education institutions, companies, financiers) located outside the EU or EEA may participate in RDI projects. In this case, the personal data necessary for the project management is usually transferred to the third countries in question. Data protection and data security are in these cases always agreed on separately.

Principles of data protection

The data of RDI projects is always processed on a case-by-case basis in different information systems that may be maintained by Turku UAS or a third party. Turku UAS' systems are secured through administrative and technical means so that the confidentiality, integrity and availability of the data can be ensured. Turku UAS tries to ensure that the principles of data protection of the other parties are at least at an equivalent level.

Data subjects' rights

The data subjects' data protection rights are described here at a general level. The rights and applying them are influenced by the legal basis of the processing, and it varies on a case-by-case basis. You can obtain more information on your rights in the project-specific data privacy notices.



According to the General Data Protection Regulation, the data subject has the right:

- to receive information on the processing of their personal data, unless otherwise regulated by the law
- to request for access to their personal data and rectification regarding incorrect or insufficient information
- to erase their data (not applied, if the basis for processing is compliance with a legal obligation or performance of a task carried out in the public interest)
- to restrict the processing of their data
- to object to the processing of their data, if the basis for processing is general or legitimate interest
- to request the transfer of data they have submitted themselves from one controller to another, if the basis for processing is consent or agreement
- withdraw the consent they have given
- notification obligation of the controller on the rectification/erasure/restricting of processing of personal data
- not to be subject to automated decision-making (the data subject may allow automated decision-making by their consent)

Data subjects may exercise their rights by contacting the contact person mentioned in the privacy notice or the Data Protection Officer. More information on data subjects' rights is provided by the contact person and/or Data Protection Officer.

If processing the data does not require identifying the data subject without additional information or the controller cannot recognize the data subject, the right to inspection, rectification, data erasure, restriction of processing, obligation to report and transmittal is not applied.

You have the right to file a complaint with the Data Protection Ombudsman's office, if you consider that valid data protection legislation has been breached in processing your personal data. The contact details of the DPO can be found in the beginning of the privacy notice. All requests are processed on a case-by-case basis.