



Privacy notice, project “Fostering implementation of the ChemClimCircle approach to Green Public Procurement in the Baltic Sea Region”; ChemClimCircle-2 or CCC-2

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

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Person in charge and contact persons

Hannamaria Yliruusi, Hannamaria.yliruusi@turkuamk.fi, +358 50 5985599
(Chief content officer)

Britt-Marie Haahti, britt-marie.haahti@turkuamk.fi, +358 50 5985662
(Administrative project manager)

Contact information of the Data Protection Officer

Harri Kilpiö, Data Protection Officer (Turku UAS),

Telephone number: +358 50 598 5830

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 data will be collected by Turku UAS, one of the partners in the consortium of the ChemClimCircle-2 project. The data will be processed within the project and for the implementation of the activities mentioned in the project plan. The project will be implemented during the period 15.11.2024 – 31.5.2028, activities focusing on the period 1.3.2025 – 1.3.2028.

Personal data is collected:

- for partner and stakeholder meetings
- for trainings and other activities arranged by the project
- in interviews and questionnaires
- for the purpose of communication and dissemination
- for reporting of activities to funder

Data collected for meetings and other activities are used for the arrangement of these occasions as well as for the verification of them to the funder, as part of reporting. Data gained from interviews and questionnaires are used for improving the materials and activities produced within the project, to be used by the beneficiaries of the project. For sharing project materials and results with Finnish stakeholders personal data can be collected.

Data collected depends on the purpose: name, e-mail, organisation, role in the organisation and allergies can be asked for. The data sets containing personnel information from Turku UAS used in the project are larger in scope to ensure the project's implementation aligns with the project plan and agreement as well as reporting needs and internal arrangements.

Legal basis for processing personal data

The legal basis is data subject's consent as well as legal obligation to which the controller is subjected.

Legitimate interests of the data controller or third party

The legitimate interest of Turku UAS for collecting data is to perform the tasks the organisation has committed themselves to via participating in the project and signing the project agreement.

Processed categories and storage times of personal data

The categories of processed personal data are 1) the Turku UAS ChemClimCircle-2-team, 2) the personnel of the project consortium and 3) the stakeholders.

The personal data will be stored according to the rules set out by the funder: All supporting documents relating to the project should be stored for a **five-year period** (known as a 'retention period') from 31 December of the year in which the Managing Authority /Joint Secretariat made the last payment to the lead partner.

Regular information sources

The personal data have been obtained from the data subject him- or herself, either directly or via e.g. an interview or questionnaire.

Receivers or receiver groups of personal data

The personal data is at first hand received by the Turku UAS project team. In case the data is requested by the funder for verification of project activities, as part of reporting, the data will also be sent forward to the lead partner preparing the reports. In case of an audit data might have to be shared with the auditing company or related authorities.

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

The data is not transferred to third countries.



Principles of data protection

The data is accessed only by people whose tasks require access to the data.
Access to the service is limited with user IDs and user rights.

Data subjects' rights

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.
