

## 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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kirjaamo@turkuamk.fi

### Person in charge and contact persons

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

Britt-Marie Haahti, [britt-marie.haahti@turkuamk.fi](mailto: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](mailto: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

Turku University of Applied Sciences (Turku UAS), as a partner in the ChemClimCircle-2 project consortium, collects and processes personal data for the purposes of implementing the project and its planned activities. The project will be implemented during the time 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 feedback forms required by the funder and from events
- in interviews (explained separately below) 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 the purpose of 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 datasets containing personal data related to Turku UAS project personnel are broader in scope to ensure that the project is implemented in accordance with the project plan and agreement, as well as to meet reporting and internal administrative requirements.

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## Interviews

In the CCC2 project, personal data will be collected in 2026–2027 for the purpose of organising and conducting interviews with procurement units from municipalities and regions and other experts. The purpose of the interviews is to collect experiences and good practices related to CCC procurement. The material collected will be used to prepare project outputs, such as publications, the CCC2 Navigator and communication materials. It will also be used to develop the project content during and after the project.

Personal data will be collected from contact lists and the project plan for the purpose of sending interview invitations and carrying out the interviews. The data will be processed in accordance with this privacy notice and applicable data protection legislation. The data will only be processed by the named project staff members.

In connection with the interviews, the following personal data of the interviewees will be processed: first name and last name, title, organisation and email address. The interviews can be recorded for transcription purposes. After transcription, the recordings will be deleted. Direct personal data will be removed from the transcribed material, and the material used for analysis will be processed in pseudonymised form so that only the name of the organisation remains. The names and other identifying information of the interviewees will be stored in a separate file. Interviews may also be conducted to collect information needed for reporting. In these cases, the interviewee's consent will be obtained before any collected information, including personal data, is shared with the funding authority. Information on the retention periods for personal data is provided in the section "Processed categories and storage times of personal data" of this privacy notice.

## Legal basis for processing personal data

The processing of personal data is based on the data subject's consent and on the legal obligations to which the controller is subject.

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### **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.

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## 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

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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.

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