

DATA PRIVACY POLICY FOR PROJECT “RESPONSIBILITY REPORTING AS A TOOL FOR CLIMATE CHANGE ADAPTATION”

Data Protection Act 2018/1050, EU General Data Protection Regulation (GDPR) 2016/679.

This privacy notice includes the information that must be provided to data subjects when processing personal data. It ensures the controller’s accountability obligation, which is a key principle in the GDPR. Accountability means that the controller must be able to demonstrate compliance with data protection legislation.

1. Data Controller

South-Eastern Finland University of Applied Sciences
Salakuljettajantie 4
48100 Kotka
Finland

Joint Controller:

Finnhub ry
Merituulentie 424
48310 Kotka
Finland

2. Contact Person for Registry Matters

Roosa Rosenqvist, Project Manager
South-Eastern Finland University of Applied Sciences
Logistics and Maritime Research Unit
Salakuljettajantie 4
48100 Kotka
Finland
+358 50 308 1606
roosa.rosenqvist@xamk.fi

3. Purpose of Processing Personal Data

Personal data is processed to implement the project activities and to carry out South-Eastern University of Applied Science’s (Xamk) research, development, and innovation (RDI) activities. More details about the project activities can be found in section 5 of this document.

4. Legal Basis for Processing Personal Data

The legal basis for processing personal data is public interest (scientific research and RDI activities of universities of applied sciences).

Processing personal data for scientific research is based on General Data Protection Regulation (GDPR) and the national Data Protection Act. Scientific research is considered a task in public interest under the GDPR, and therefore scientific research carried out in the public interest constitutes a legal basis for processing personal data (Data Protection Act). Scientific research is considered a task in the public interest under GDPR, which also covers RDI activities (Recital 159).

5. Name, Nature, Duration, and Actors of the Project

The name of the project is Sustainability Reporting as a Tool for Climate Change Adaptation.

The objective of this project is to advance climate change adaptation in the logistics sector and to increase the use of sustainability reporting as a tool to meet various sustainability requirements and to strengthen business competitiveness. Project activities include organizing information sessions and workshops, as well as piloting sustainability reporting tools with companies. In addition, feedback surveys will be conducted to improve communication and to ensure the content is relevant for the companies. The project also fosters networking and knowledge sharing among regional actors.

Duration of the project is 1.11.2025-28.2.2027.

Main project actors are Roosa Rosenqvist (Xamk) and Elina Multanen (Finnhub). In addition, other staff from the two organizations (Xamk and Finnhub) may be involved in processing personal data.

5. Project Partners and Their Responsibilities

The lead partner in this project is South-Eastern Finland University of Applied Sciences (Xamk). The project has one project partner, Finnhub. The entire project will be carried out in close cooperation between the lead partner and the project partner.

As joint data controllers, both project parties comply with the applicable legislation on the processing of personal data and data protection, such as the EU General Data Protection Regulation (2016/679) and the guidelines issued by supervisory authorities. The project parties process personal data only for the purpose specified in this notice and do not use personal data for any other purposes of their own.

6. Types of Processed Data

Personal data processed in this project includes names, job titles, workplaces (company/organization) and contact details (phone, email) of individuals, and possibly other additional information, if such information is provided by the individuals themselves.

7. Sources of Data

Personal data is mainly collected directly from individuals, for example during participation in an event or other collaboration. Data may also be collected from public sources or partner/authority registers.

8. Disclosure of Personal Data to Third Parties

Data is not regularly disclosed to third parties. Information may be published to the extent agreed upon with the subject of the data. Certain data may be shared with the project funder for reporting or audits (e.g., participant lists) according to the funder's requirements.

9. Käsitelläänkö tietojani EU:n tai ETA:n ulkopuolella? Transfer of Data Outside EU/EEA

Data is not transferred outside EU/EEA by the data controller.

Xamk uses Microsoft cloud services (Teams, OneDrive), which primarily process data within EU/EEA and regional data centers. Microsoft is committed to comply with the GDPR. Microsoft's privacy statement: <https://privacy.microsoft.com/fi-FI/privacystatement>.

10. Duration of Data Retention

Personal data is retained for the duration of the project and as long as necessary. In projects, personal data is retained in accordance with the archiving period required by the funders. Project materials and documents, which may also contain personal data, are archived according to Xamk's practices: EU-funded projects require a 10-year retention period after the program ends.

11. Data Protection Measures

The data is stored in an information system. Users have personal user credentials. Only those individuals acting as controllers who have the right to access the data due to their work can access and use the system's information.

Customer and stakeholder data is stored in a customer management system, where maintaining the data is protected by an AD account and password. The data stored in the system is available only to a restricted group of users.

12. Using the Rights of Data Subjects in Accordance with the Data Protection Act

Data subjects can direct all requests related to this project to the contact person below.

Roosa Rosenqvist, Project Manager

South-Eastern Finland University of Applied Sciences
Logistics and Maritime Research Unit
Salakuljettajantie 4
48100 Kotka
Finland
+358 50 308 1606
roosa.rosenqvist@xamk.fi

When the legal basis for processing data is public interest, the data subject has following rights:

- The right to receive information about the processing of personal data, unless an exception is specifically provided by law
- The right to access the data
- The right to rectify the data
- The right to restrict the processing of data
- The obligation to notify regarding the rectification or restriction of processing of personal data
- The right to object to the processing of data
- The right not to be subject to automated decision-making without a legal basis