

## Privacy statement

Date: 14 June 2022

### Controllers

The joint controllers are the

**Innovation Funding Agency Business Finland** (Business ID 0512696-4) (hereinafter the “**Funding Agency**”)

and

**Business Finland Oy** (Business ID 2725690-3) (hereinafter the “**Company**”),

both together “**Business Finland**”

Porkkalankatu 1  
00101 Helsinki  
PL 69, 00101 Helsinki (Funding Agency)  
PL 358, 00181 Helsinki (Company)  
Tel. +358 (0)29 505 5000

### Contacts in matters regarding the register

[tietosuoja@businessfinland.fi](mailto:tietosuoja@businessfinland.fi)

### Name of the register

Business Finland’s funding information customer register

### Purpose and basis of the processing of personal data

The purpose of processing personal data is to carry out tasks and measures related to funded projects or funding applications submitted to the Funding Agency or the Company and to develop operations based on the feedback received.

In this regard, the processing of personal data is based on Article 6 of the General Data Protection Regulation and the national legislation regulating the funding activities of both the Funding Agency and the Company (in particular, the Act on Innovation Funding Agency Business Finland and the limited liability company called Business Finland (1146/2017, hereinafter the Business Finland Act), the Act on Discretionary Government Grants (688/2001), the Act on Central Government Lending and Central Government Guarantees (449/1988), and the Act on the Customer Information System for Business Services (293/2017)).

The Funding Agency and Company carry out tasks related to funding activities following harmonized processes with common tools, both organizations acting within the scope of their competences under the Business Finland Act. Both organizations may need to carry out different stages of related tasks to fulfill their mission. The Funding Agency supervises the Company's operations. Due to the aforementioned reasons, the funding information system's personal register has also been merged.

Processing tasks have been partly outsourced to the controller's external service providers in accordance with and within the limits set by data protection legislation.

### **Data content of the register**

The following types of data shall be entered into the register:

- A project's contact persons, persons responsible for the project, and the contact person for cost statements (this information is always recorded)

Information on the following persons shall be recorded on a project-by-project basis as necessary:

- The applicant's/organization's responsible persons (e.g., members of the Board of Directors and the CEO), contact information, and owner information
- The ultimate beneficial owners of the applicant organization and information on the persons controlling it;
- Information on the persons required to identify the customer and comply with sanctions legislation;
- People working in the project and their experience and competence, often a CV
- The project's auditor

On a case-by-case basis, information relevant to the above-mentioned persons:

- Person's name, title, contact information, electronic identification and, in some cases, date of birth, nationality, salary information, employment contract (the latter may include personal identification numbers and salary information) and whether the person is politically exposed (PEP)
- Credit default information from Suomen Asiakastieto Oy on the applicant's responsible persons, as well as the credit rating report and owner information
- Taloustutka Oy's data on responsible persons
- Information from the Finnish Patent and Registration Office (PRH) on the applicant's responsible persons
- Certain personal data are checked from the Grey Economy Information Unit; salaries paid, responsible persons, social security, information about business prohibitions (obligation compliance report)
- Information from public sources on convictions for financial crimes

### **Customer feedback**

The customer's opinion of the quality of the funding process and service. Standardized questions and open feedback.

In the case of RRF funding projects, the following persons will also have their name and date of birth recorded in the register:

- The beneficial owners of the applicant organization;
- Where the beneficiary is a contracting entity, the register will contain the identity of the natural person who will act as a contractor or subcontractor for the funded project;
- Where the beneficiary is a contracting entity for which the contractor is a legal entity, we will collect information on the beneficial owners of the contractor

In addition, the information system contains information about the project to be funded and the applicant/recipient's financial situation.

### **Retention period of personal data**

Personal data will be deleted from the operational system 10 years after the project ends, unless the project involves ongoing auditing or other measures, or unless the project is still in the process of fulfilling its obligations, such as loan repayment. Funding documents are stored in case management as per the information management plan, and some of the documents are submitted for archiving by the decision of the National Archives. Customer feedback is stored for 5 years from receipt.

For RRF funding projects, the data will be stored at least until the end of 2032.

### **Regular sources of information**

Regular sources of information include:

- Information provided by the funding applicant
- Registers of different authorities
- Suomen Asiakastieto Oy
- Finnish Patent and Registration Office's (PRH) Trade Register
- Taloustutka Oy
- International sanctions lists and information from commercial intermediaries' registers for customer due diligence.
- Public sources

### **Regular data disclosures and categories of recipients**

The applicant/beneficiary shall indicate the project's contact persons and responsible persons (name, contact details). These data can be disclosed to the organizations mentioned in the Act on the Customer Data System for Enterprise Services (293/2017).

Names and contact information will also be disclosed to the Company for carrying out the functions described in the Business Finland Act. Names and contact information can also be disclosed to other stakeholders, for example, for event arrangements and invitations, but not for commercial purposes. Information on the applicant's/organization's responsible persons is also disclosed to Suomen Asiakastieto Oy to obtain payment default information.

The disclosure of data is based on the Act on Discretionary Government Transfers (688/2001), Act on Customer Data Systems for Business Services (293/2017), Business Finland Act (1146/2017) and the Credit Information Act (527/2007).

Part of the energy funding applications submitted to the Funding Agency are forwarded to the Ministry of Economic Affairs and Employment for a decision under the Government Decree on the General Conditions for Granting Energy Support in 2018-2022 (1098/2017). In this respect, personal data is also processed by the Ministry of Employment and the Economy.

Personal data related to funding projects are also disclosed to the State Treasury.

Customer feedback is only published anonymously.

Some of the projects funded include the name and telephone number of the project contact person in the Business Finland website's open data.

### **Transfer of data outside the EU or the EEA**

Personal data will not be transferred outside the EU or the EEA.

### **Protection of the register**

#### Manual material

Manual material is stored in a locked space, which can only be accessed by authorized persons.

#### Electronically processed data

Access to the information system is restricted to persons who need the information in their daily work. The data in the information system is confidential, as it also contains the business secrets of funding applicants.

Data and backups stored in the information systems are located in locked and controlled spaces. The equipment that holds the register is protected and separated from the public network by a firewall and other technical measures.

The information system users (the Funding Agency's personnel and the Company's personnel in funding activities) are bound by the obligation of professional secrecy per the Public Disclosure Act (621/1999). In addition, employees are committed to complying with internal data security guidelines.

The above measures are designed to safeguard the confidentiality, availability and integrity of the personal data stored in the register and the rights of data subjects.

### **Other rights of data subjects in the processing of personal data**

#### **Right of access by the data subject (right of access)**

The data subject has the right to inspect the data concerning themselves stored in the register. The request for inspection should be made in accordance with the instructions given in this Privacy Policy. The right of access may be denied on the grounds laid down by law. In principle, exercising the right of access is free of charge.

#### **Right of the data subject to obtain rectification, erasure, or restriction of processing**

To the extent that the data subject is able, they shall, without undue delay, upon becoming aware of an error or upon discovery of the error themselves, correct, delete or supplement any information in the register which is contrary to the purpose of the register, incorrect, unnecessary, incomplete or outdated.

To the extent that the data subject is unable to correct the data themselves, they shall submit a correction request in accordance with section 12 of this Privacy Policy.

In addition, the data subject has the right to require the controller to restrict the processing of their personal data, for example, in a situation where the data subject is awaiting the controller's response to a request for rectification or erasure of their personal data.

### **Right of the data subject to lodge a complaint with a supervisory authority**

The data subject has the right to file a complaint with a competent supervisory authority if the controller has not complied with the applicable data protection rules.

### **Contacts**

In all matters regarding the processing of personal data and in situations related to exercising personal rights, the data subject should contact the controller. Data subjects can exercise their rights by contacting [tietosuoja@businessfinland.fi](mailto:tietosuoja@businessfinland.fi).

This Privacy Policy was last updated on 14 June 2022.

The controller monitors changes in data protection legislation and aims to improve its operations continuously, and therefore reserves the right to update this privacy policy.