

## Privacy statement

Drafted on 23 May 2018

### 1. Register controller

Innovation Funding Agency Business Finland, business ID: 0512696-4  
Porkkalankatu 1, PO Box 69, FI-00101 Helsinki  
tel. +358 29 505 5000

### 2. Contact person for matters related to the register

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

### 3. Register name

The customer register of Innovation Funding Agency Business Finland's (later Business Finland) funding information system.

### 4. Purpose of personal data use and grounds for processing personal data

The purpose of personal data processing is to handle tasks related to funding applications submitted to Business Finland, as well as tasks related to financed research-, development- and innovation projects, and to develop operations on the basis of feedback.

Personal data processing is based on Article 6 of the Data Protection Regulation 2016/679 and related national legislation: Act on Innovation Funding Agency Business Finland and a limited company under the title Business Finland (1146/2017), the Act on Discretionary Government Transfers (688/2001) and the Act on State Lending and State Guarantees (449/1988).

Processing tasks may be outsourced to the controller's third-party service providers, as provided for in and in compliance with data protection legislation. The processing of customer feedback is partly outsourced.

### 5. Data contained in the register

The register contains the following types of information:

- Project's contact persons and key persons, and the contact person for financial administration (this information is always entered in the register).
- Information about the following persons is entered in the register on a project-specific basis, if necessary:
  - key persons of the funding applicant/organization (e.g. board members and CEO) and their contact details
  - persons working in a project, their experience and competence, often a CV
  - the project's auditor
- The following information concerning the above-mentioned persons is entered in the register on a case-specific basis:

- person's name, title, contact details, ID for the Online Service and in some cases salary data, employment contract (may contain personal identity codes and salary data)
- payment default information from Suomen Asiakastieto Oy, concerning the applicant's key persons, and a credit rating report
- key persons from Taloustutka
- information concerning the applicant's key persons from the Finnish Patent and Registration Office
- certain personal data from the Grey Economy Information Unit will be checked; paid salaries, key persons and personal identity code, information on business prohibition (debt service obligation report)
- Customer feedback
  - Customer's view of the quality of the funding process and service. Questions in due form and open feedback.

Furthermore, the information system contains information about the project to be funded and the financial situation of the funding applicant/recipient.

## **6. Storage period of personal data**

Personal data will be removed from the operating system 10 years after the project has been concluded. Information contained in documents will be disposed of in accordance with the data control plan. Customer feedback is stored for two years after it has been received.

## **7. Regular sources of information**

Regular sources of information include:

- Information provided by the funding applicant
- The registers of various authorities
- Suomen Asiakastieto Oy
- Trade register information of the Finnish Patent and Registration Office
- Taloustutka Oy

## **8. Regular disclosure of data and groups of recipients**

The funding applicant/recipient submits information concerning the project's contact and key persons (name, contact information). Such information may be disclosed to organizations stated in the Act on the Customer Data System for Enterprise Services (293/2017). Name and contact information may be disclosed to Business Finland Oy and other stakeholders for example to organize events and send invitations, but only for non-commercial purposes. Information on the key persons of the applicant/organization is also disclosed to Suomen Asiakastieto Oy, for the reception of payment default information.

The disclosure of information is based on the Act on Discretionary Government Transfers (688/2001), the Act on the Customer Data System for Enterprise Services (293/2017) and the Credit Information Act (527/2007).

Customer feedback may be published, but the customer is entitled to prevent its publication.

The name and telephone number of the project's contact person are included in the public information material on Business Finland's website.

## **9. Transfers of information outside the EU and the EEA**

Personal data is not transferred outside the European Union or the European Economic Area.

## **10. Protection principles of the register**

### Manual materials

Manual materials are stored in a locked space that can only be accessed by authorized persons.

### Electronically processed data

The information system can only be accessed by persons who need such information in their daily work. The data stored in the information system is confidential, since it contains the business secrets of funding applicants.

Data stored in information systems and backup copies are located in locked facilities which are monitored. The hardware on which the register is located is secured and separated from the public network by a firewall and other technical measures.

The users of the information system (Business Finland personnel) are bound by an obligation to maintain secrecy as laid down in the Act on the Openness of Government Activities (621/1999). Employees have also agreed to follow internal data security guidelines.

The purpose of the measures presented above is to secure the confidentiality of personal data stored in the register, the availability and integrity of the data, and the implementation of data subjects' rights.

## **11. Other rights of the data subject related to personal data processing**

### **Data subject's right to access data (right of inspection)**

A data subject is entitled to inspect what personal data has been stored in a register. An inspection request must be submitted as instructed in this privacy statement. The right of inspection may be declined on legal grounds. In principle, using the right of inspection is free of charge.

### **Data subject's right to request data to be corrected, removed or its processing to be limited**

Insofar as a data subject may act independently, they must without undue delay after being notified of an error, or after having detected an error, correct, remove or supplement the incorrect, unnecessary, insufficient or outdated information included in the register, or information that is contrary to the purpose of the register.

If a data subject is unable to correct the information themselves, a request for correction must be submitted in accordance with Section 12 of this privacy statement. A data subject may also request that a register controller limit the processing of their personal data if the data subject is awaiting a response from the register controller to a request to correct or remove information, for example.

### **Data subject's right to file a complaint with the supervisory authority**

A data subject is entitled to file a complaint with a competent supervisory authority if a register controller has not followed the applicable data protection regulation in its operations.

### **12. Contacts**

Data subject should contact the register controller with any questions related to personal data processing and exercising their rights. Data subjects may exercise their rights by contacting [dataprotection@businessfinland.fi](mailto:dataprotection@businessfinland.fi).