

Dated 3.4.2025

Privacy Statement of the Jane and Aatos Erkko Foundation

1. Data Controller

Jane and Aatos Erkko Foundation sr
1758434-8

P.O. Box 144, 00101 Helsinki
+358 9 6120 6214

saatio@jaes.fi

2. Person Responsible for the Registers

Hanna-Mari Peltomäki, Secretary General
hanna-mari.peltomaki@jaes.fi

3. Names of Registers

- 1) Register of Grant and Scholarship Applicants
- 2) Register of Grant and Scholarship Recipients
- 3) Stakeholder Register

4. Purpose and Legal Basis of Personal Data Processing

Personal data is collected and processed to enable the operations of the foundation (legitimate interest). This includes processing applications, analysing them, and archiving. The purpose of personal data processing also includes providing information and other communication related to stakeholders.

Based on the public interest, foundation publishes the names of grant recipients on its website and submits the data to the research information database maintained by the Ministry of Education and Culture (<https://research.fi/en/>).

The foundation also has a statutory obligation to collect personal data related to grants and scholarships for reporting to authorities and for accounting purposes.

We may use AI-based tools to assist in analysing applications, but we do not engage in profiling that would have legal or otherwise significant effects on the data subject.

Where processing is based on public interest, we have assessed that there is societal interest in having open information on how the foundation's assets are used and what kind of research is conducted in Finland. Based on legitimate interest, the foundation may monitor its activities, the allocation of grants, the application history of applicants, and grant payments, as well as investigate possible misuse. We have assessed that such processing is not in conflict with the fundamental rights or freedoms of the applicant.

Non-essential cookies are based on the consent of the data subject.

Register of Grant and Scholarship Applicants:

The register of grant and scholarship applications submitted to the Jane and Aatos Erkkö Foundation for the purpose of making grant and scholarship decisions. In addition, it may be used for statistical and research purposes.

Register of Grant and Scholarship Recipients:

For the monitoring and payment of awarded grants and scholarships, as well as for reporting payments to authorities. In addition, it may be used for statistical and research purposes.

Stakeholder Register:

For communication and other interactions produced for the stakeholders of the Jane and Aatos Erkkö Foundation.

5. Content of the Registers

Register of Grant and Scholarship Applicants:

The main applicant is requested to provide the following information on the application form: name, year of birth, degree, profession/title, gender (optional), the organization they represent, and contact information. For other key project personnel, the same information is requested, along with the country of representation in cases of international cooperation. If the applicant is an organization, the name of the organization and business ID are requested in addition to the contact person's information. The application must also include information on the purpose of the requested grant or scholarship, the applied amount, duration, place and country of execution, details on joint projects/consortia, the name and email address of a referee, a funding plan, the applicant's previous funding, and any other ongoing funding applications. The applicant may also attach other documents to the application. (such as degree certificates, CVs, portfolios, research or project plans, publication lists, activity reports, etc.). The register will also contain recommendation letters, expert evaluations, and any relevant email correspondence between the foundation and the applicant relating to the application.

Register of Grant and Scholarship Recipients:

In addition to the previous information, the applicant's and authorized persons' personal identification numbers obtained through strong authentication, the date and amount of the grant or scholarship awarded, the payment requests and payment contact details for the grant or scholarship, the names and email addresses of the persons authorized by the applicant, and interim and final reports. Additionally, the system records information entered by the foundation's employees related to the processing, monitoring, and payment of the awarded grant, as well as messages sent between the foundation and the applicant through the messaging function.

Stakeholder Register:

Depending on the stakeholder, the register may include the following information: contact person's name, title or profession, organization name, and contact details.

6. Regular Sources of Information

Information is regularly obtained from the grant or scholarship applicant and, if necessary, from other funding bodies. For communication purposes, contact details are obtained

directly from the data subjects. Contact details may also be collected and updated from public sources of stakeholders.

The information of external referees and their recommendations is obtained at the request of the grant or scholarship applicant. To ensure impartiality, the foundation does not provide recommendations to the applicant.

A summary of the assessments of the foundation's experts and the secretary general is recorded in the system, based on the information received from the application, as well as the statistical data from the processing round and year. Assessments are not disclosed to applicants. The identities of external experts used by the foundation and their justifications are not made public.

7. Cookie Policy

A cookie is a small file that a website stores on a visitor's computer and is provided by the visitor's browser to the website each time they visit the site. The Jane and Aatos Erkkö Foundation uses cookies on its website to monitor traffic on the foundation's website and its associated grant system. Cookies are not used for marketing or advertising. The placement of non-essential cookies is based on the user's consent.

8. Data Processors and Regular Transfers of Data

Information on grant and scholarship applications and awarded grants is processed by the staff of the Jane and Aatos Erkkö Foundation, the board, external experts, and administrators of electronic systems with whom a personal data processing agreement has been made.

Data from the stakeholder register is processed by the foundation's staff and administrators of electronic systems with whom a data processing agreement has been made.

All individuals processing personal data in the foundation's registers are bound by a confidentiality obligation. Awarded grants and scholarships are published on the foundation's website www.jaes.fi, in the foundation's annual report, and in press releases.

Since 2023, information on awarded grants has been provided to the Ministry of Education and Culture's research information database (as per the Act on Research Information Storage 1238/2021 Sections 3 and 4). This information is published at tiedejatutkimus.fi, managed by CSC - IT Center for Science Ltd. The Ministry of Education and Culture is the controller of the research information database, and CSC is the processor of personal data in this context. The privacy policy of the research information database can be found at <https://research.fi/en/privacy>.

Paid grants and scholarships are reported to the Finnish Tax Administration and the Farmers' Social Insurance Institution in accordance with Section 141 b of the Farmers' Pension Act.

The applicant's data may be shared with other funding bodies if necessary. Data will only be shared to the extent necessary. Data may also be provided to authorities or legal entities if legally required.

9. Transfer of Data Outside the EU or European Economic Area

The Jane and Aatos Erkkö Foundation primarily processes and stores personal data within the EU or European Economic Area. However, the foundation may use service providers who process personal data outside these regions. In such cases, the protection of the data is ensured in accordance with data protection legislation, such as by using standard

contractual clauses approved by the European Commission.

10. Protection of Personal Data

The Jane and Aatos Erkkö Foundation protects data with necessary technical and organizational measures. The providers of the grant and archiving systems, as data processors, are responsible for safeguarding the data with necessary technical and organizational measures and process the data only according to the agreement with the foundation.

Persons handling personal data are bound by a confidentiality obligation. Access to systems is granted only to designated individuals who log into the grant and archiving systems either with online banking credentials or a personal username and password. User logs are recorded.

Manual data is stored in the locked premises of the foundation's office, with access restricted to relevant personnel.

11. Retention of Personal Data

Rejected or Drafted Grant Applications:

Address, phone number, and email information from rejected grant and scholarship applications are removed from the case management system after three years from the processing year. After this, the information is transferred for analysis and archiving purposes as described below.

Incomplete draft applications and reports are retained for a maximum of two years or until the applicant deletes them.

Awarded Grants and Scholarships:

Data on awarded grants and scholarships is retained in the case management system for at least 13 years from the date of the application. After this, the personal identity numbers, address, phone number, and email of the applicant and authorized persons are deleted from the system. The data is then transferred for archival and analytical use as described below.

Payment data is retained for at least 10 years from the last payment transaction, in accordance with accounting law.

Analytics and Archiving:

For purposes of analysis based on legitimate interest or for archiving, scientific, or historical research as per Article 89 of the EU General Data Protection Regulation (GDPR), data from grant applications is retained in the case management system for up to 30 years. During the archival phase, data on grants and scholarships is transferred for permanent storage. The data is minimized, and contact information of the applicant and representatives, as well as attachments from rejected applications, are deleted.

Grants published on the website, information submitted to the research information database, and records in decision documents regarding grants are retained permanently based on public interest.

Stakeholders:

Contact details of stakeholders are retained as long as the individual holds a position in which they are likely to be interested in the foundation's activities. The data subject may also request the removal of their information.

Cookies:

Non-essential cookies are retained based on the consent provided, typically for around 12 months depending on the specific cookie.

12. Rights of the Data Subject

12.1. Right of Access

Grant and scholarship applicants, as well as recipients, have the right to inspect the personal data concerning them in the registers of the Jane and Aatos Erko Foundation. In addition to personal data, the data subject has the right to verify the following information:

- The source of the personal data
- The purpose for which the data is needed
- The duration for which the data will be retained
- Whether the personal data has been or is intended to be disclosed to a third party – if so, to whom
- Whether the data has been transferred outside the EU – if so, how it is protected
- Whether automated decision-making is used in the processing of personal data – if so, what this entails
- How they can exercise their rights related to personal data

Requests for inspection must be made in writing and individually, preferably in a letter signed personally, sent to:

Hanna-Mari Peltomäki, Secretary General
Jane and Aatos Erko Foundation
P.O. Box 144
00101 Helsinki

We will respond to the request for inspection within one month of receiving the request. If further investigation is required, we may inform the requester that we need more time. The extension will be a maximum of three months.

By logging into the foundation's online service, applicants can review the details of their incomplete and submitted applications. Grant recipients can also check submitted reports, payment requests, authorizations, and any online communication with the foundation via the service.

The data subject has the right to request a copy of their personal data. However, the foundation will not disclose evaluations or opinions regarding the application to protect the privacy and impartiality of evaluators and referees.

12.2. Right to Rectification

Grant and scholarship applicants, as well as recipients, have the right to request the rectification of inaccurate personal data or the completion of incomplete data in the registers of the Jane and Aatos Erko Foundation.

Requests for correction must be made individually, preferably in a letter signed

personally, sent to:

Hanna-Mari Peltomäki, Secretary General
Jane and Aatos Erkkö Foundation
P.O. Box 144
00101 Helsinki

We will respond to the request for correction within one month of receiving the request. If further investigation is required, we may inform the requester that we need more time. The extension will be a maximum of three months.

Through the online service, the data subject can update part of their user information.

12.3. Restriction and Objection to Processing

In certain cases, the data subject can request the controller to restrict the processing of their personal data partially. The data subject may also object to the processing of their personal data entirely based on special reasons related to their personal situation.

Requests to restrict or object to the processing of personal data must be made individually, preferably in a letter signed personally, sent to:

Hanna-Mari Peltomäki, Secretary General
Jane and Aatos Erkkö Foundation
P.O. Box 144
00101 Helsinki

We will respond to the request within one month of receiving it. If further investigation is required, we may inform the requester that we need more time. The extension will be a maximum of three months.

12.4. Right to Data Portability

The data subject has the right to receive the personal data they have provided to the grant and scholarship service in a machine-readable format, provided that the data is processed based on consent or a contract with the data subject.

Requests for data portability must be made individually, preferably in a letter signed personally, sent to:

Hanna-Mari Peltomäki, Secretary General
Jane and Aatos Erkkö Foundation
P.O. Box 144
00101 Helsinki

We will respond to the request within one month of receiving it. If further investigation is required, we may inform the requester that we need more time. The extension will be a maximum of three months.

12.5. Right to Erasure

The Jane and Aatos Erkkö Foundation may, upon request, erase the data of the applicant, grant recipient, or other data subject from its register if one of the following conditions is met:

- The personal data is no longer needed for the purposes for which it was collected or otherwise processed

- The data subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing
- The personal data has been processed unlawfully

Requests for erasure must be made individually, preferably in a letter signed personally, sent to:

Hanna-Mari Peltomäki, Secretary General
Jane and Aatos Erkko Foundation
P.O. Box 144
00101 Helsinki

We will respond to the request for erasure within one month of receiving it. If further investigation is required, we may inform the requester that we need more time. The extension will be a maximum of three months.

12.6. Right to Withdraw Consent

The data subject can withdraw their consent at any time. Withdrawing consent does not affect the processing carried out before the withdrawal. Consent for cookies can be withdrawn in the cookie consent settings on the website.

12.7. Right to File a Complaint

The data subject has the right to file a complaint with the Data Protection Ombudsman if they believe that the processing of their personal data is unlawful.

Instructions for submitting a complaint: <https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman>

More information about the rights of the data subject:

<https://tietosuoja.fi/en/rights-of-the-data-subject>