

Privacy notice for EPM ENSURE project website

The privacy notice is based on the EU's General Data Protection Regulation (2016/679, "GDPR") and Finnish Data Protection Act (1050/2018). Version [5.9.2024/1]. The privacy notice can be updated. The data subject can review the up-to-date content by regularly visiting the EPM ENSURE project website.

1. Name of the purpose of processing

EPM ENSURE policies and procedures on the collection, use and disclosure of personal data when using the website

2. Controller(s), data protection officer and contact person(s)

VTT Technical Research Centre of Finland Ltd ("VTT"), business ID: 2647375-4, Tekniikantie 21, 02150 Espoo

Address: VTT Technical Research Centre of Finland Ltd., Register Office, P.O. Box 1000, FI-02044 VTT, Finland

E-mail: dataprotection@vtt.fi (DPO, data security and their substitutes)

Contact details of the contact person:

Name: [Daniel Österbacka](#)

Address: Tekniikantie 1, 02150, Espoo Finland

E-mail: daniel.osterbacka@vtt.fi

3. Personal data to be processed

The personal data to be processed are: [Email address](#), first name and last name and website usage data collected through cookies and other tracking technologies.

There is a separate cookie notice and selection on the website.

The data subjects represent the following groups: A person visiting EPM ENSURE website

4. Purpose of processing and legal basis

The purpose of usage data is to assess content usage and to compile statistics about the use of website in order to improve the user experience.

Legal basis for the processing of personal data¹:

- Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(b) of the GDPR)
- Legal obligation of the controller (Article 6(c) of the GDPR)
- Legitimate interest pursued by the controller or by a third party (Article 6(f) of the GDPR) to maintain and develop the website
- Consent of the data subject for the purpose of responding to requests and sending newsletters (Article 6(a) of the GDPR)

¹ GDPR Article 6 and Section 4 of the Data Protection Act.

Other

5. Data sources

Personal data are obtained from the data subject through the website contact form, newsletter subscription form and cookies.

6. Recipients or categories of recipients of personal data

Name and contact details of the recipient/Type of recipient (if there is a justifiable reason not to specify)	Purpose of the disclosure, role of the recipient in the processing
VTT coordinator	Responding to the inquiries of people contacting through the website
VTT coordinator	Collecting email of newsletter subscribers and sending out the newsletters to them

VTT may from time to time change the service providers used in the processing of personal data, for example in connection with public procurement. These will be notified by updating the privacy notice.

7. Transfer of personal data outside the EU or the EEA

No

Personal data may be transferred outside the EU/EEA in compliance with GDPR. In the absence of European Commission's adequacy decision, VTT may rely on European Commission's standard contractual clauses as a transfer basis.

8. Storage period of personal data

The data are processed for a maximum of 4 years after the collection of data until the project ends in 2027. After that, the data will then be removed or anonymized.

9. Principles of personal data protection

Protection of personal data processed in an **information system**:

User ID

Password

Multi-factor authentication (MFA)

Access control (IP addresses)

Logging

10. Rights of the data subject

The data subject has the following rights, however, which may be derogated from and/or restricted in accordance with applicable legislation. Please note that in case the controller cannot identify the data subject, certain rights of the data subjects may not apply, unless the data subject provides additional information enabling his or her identification.² Restriction and deviation are verified on a case-by-case basis.

² Article 11 of the GDPR.

The data subject may exercise the above rights by contacting the controller using the contact details specified in item 2, preferably by e-mail.

right to withdraw consent (and right to erase data)
 right of access
 right to rectification
 right to erasure (so-called “right to be forgotten”)
 right to restrict the processing of data
 right to data portability
 right to lodge a complaint with a supervisory authority

Further information on the data subject’s rights:

Right to withdraw consent

If the processing is based on consent, the data subject has the right to withdraw their consent at any time regarding the processing of their personal data.

The data subject’s right to access data

The data subject has the right to obtain confirmation from the controller as to whether personal data concerning them are processed. In addition, the data subject has the right to access his or hers personal data and information on the processing of personal data.

Right to rectification

The data subject has the right to have inaccurate and incorrect personal data concerning the data subject rectified and incomplete personal data completed without undue delay.

Right to erasure, so-called “right to be forgotten”

The data subject has the right to have the controller erase personal data concerning the data subject without undue delay.

Right to restriction of processing

In certain situations, the data subject has the right to demand that the controller restrict the processing.

Right to object to the processing

In certain situations, the data subject has the right to object to the processing of personal data concerning them.

Right to portability

The data subject has the right to receive personal data concerning them that they have provided to the controller and the right to transmit those data to another controller in so far as the processing is based on consent or contract and the processing is carried out automatically.

Right to lodge a complaint with a supervisory authority

The data subject has the right to lodge a complaint with supervisory authorities if the data subject considers that their rights have been violated in the light of the EU General Data Protection Regulation. Contact details of Finnish Data Protection Ombudsman: <https://tietosuoja.fi/en/contact-information>