

**1. Controller**

Turun kauppaopetussäätiö sr.  
Business ID: 0489910-5  
c/o Kirjanpito toimisto Taina Niemelä Oy, Purokatu 25, FI-20810 TURKU  
[www.turunkauppaopetussaatio.fi](http://www.turunkauppaopetussaatio.fi)

**2. Name of data file**

Turun kauppaopetussäätiön apurahajärjestelmä (Turun Kauppaopetussäätiö grant system)

**3. Controller contact person**

Paula Virri is the contact person  
[info@turunkauppaopetussaatio.fi](mailto:info@turunkauppaopetussaatio.fi)

**4. Lawful basis for and purpose of personal data processing**

The personal data that is collected is used to process applications for grants and awarded grants and for contact purposes, as well as to enable and develop monitoring of the functioning of the digital service. The data file contains data that is submitted in grant applications, plus data that is required for ordering the payment of awarded grants and for project progression, and data that pertains to final reports. Grant applicant and work group member contact details are collected from the grant/stipend applicants and stored in the system. An applicant may also name referees, and any referee data submitted by the applicant will be stored in the system. Grant/stipend payment ordering and payment data is also collected, as is data concerning the applicant's activities in the grant portal and use-related technical data, such as event log data. In addition, the internal system messaging between the data subject and the controller is also collected. Grant applicant data is also stored and processed based on the applicant's consent and the controller's grounds of legitimate interest. The applicant must obtain the individual consent of the application's other data subjects for personal data processing, which will then take place on the basis of consent. The applicant must submit personal data on the application form and appendices in order for an application to be accepted for processing. The application may not be processed if sufficient personal data is not provided.

**5. Personal data recipient groups**

Personal data is processed by Turun Kauppaopetussäätiö's board, by assessors separately specified by the Turun Kauppaopetussäätiö, by persons providing technical support, by named users dealing with accounting and payment orders, and by auditors. Data is only displayed to the extent necessary in order for the recipient group to perform its tasks.

**6. Protection of the data file**

Personal user credentials are required in order to access the data file. The main user also specifies the user access level set for users. Logging in to the system requires a personal password, and use of the system takes place via a protected SSL connection. Use of the data file and logins to it are monitored. Data is collected in the service's databases, which are protected using various technical

means. The cloud service servers are located in locked and guarded spaces, and only persons specified in advance are allowed to access the data.

## **7. Duration of personal data storage**

Users' credentials and related personal data

- User credentials are stored for as long as users have applications that have not been marked as ended.
- If, at the time of review, user credentials have not been used for more than three years and the applicant has no active applications, the user credentials will be deleted from the system.

Incomplete applications

- Applicants can delete incomplete applications from the system themselves.
- Turun Kauppaopetussäätiö will delete incomplete applications no later than 12 months from the end of the application period.

Application assessment details

- Assessment details are deleted within one year from the end of the calendar year in which the grant was awarded.

Rejected applications

- Turun Kauppaopetussäätiö will delete or anonymise rejected applications within two years after the end of the calendar year in which the application was submitted. Anonymisation removes all personal data from the application data. Messages relating to the application will be deleted when the application is deleted or if the messages are deemed to be unnecessary. Appendices to applications will be deleted within two years after the end of the calendar year in which the grant was awarded. Account numbers and personal ID numbers in payment ordering data will be deleted within 2 years from the approval of the final report. Key data on successful applications (recipient, purpose, amount awarded, classifications) will be stored on a long-term basis. Reports on awarded grants are stored on a long-term basis.

## **8. Rights of the data subject**

- The right to access the personal data collected from the data subject. The data subject should submit a written request for their data and the controller will provide information about the collected data.
- The right to submit a written request for the correction of inaccurate data
- The right to request the erasure of data. The controller is obligated to erase data if one of the following grounds is met:
  - the personal data is no longer required for the purposes for which it was collected
  - the data subject withdraws their consent
  - the data subject objects to processing and there are no grounds for processing, or the data subject objects to direct marketing purposes
  - the personal data has been used illegally
  - the personal data must be erased in order to comply with a legal obligation

- your personal data has been collected in connection with the provision of information society services
  - The right to request the restriction of processing
  - The right to transfer data from one system to another:
  - If a data subject's personal data is processed on the basis of the data subject's consent, the data subject has the right to withdraw consent at any time without affecting the legality of the processing that took place on the basis of consent before the consent was withdrawn.
  - To submit a complaint to the personal data processing supervisory authority, if you feel that your personal data is being processed incorrectly.

#### 9. Disclosure of data

Data concerning grants awarded to natural persons is disclosed to the Farmers' Social Insurance Institution MELA if the amount of the grant and use period exceed the limits set by MELA. Data on grants paid to natural persons is disclosed to the Finnish Tax Authority. The amounts of awarded grants and their recipients, and possibly project/research abstracts will be published on Turun Kauppaopetussäätiö's website and in its annual report. Turun Kauppaopetussäätiö may disclose necessary personal data relating to awarded grants and grants for which applications have been received to other bodies that award grants/stipends.