



Privacy Notice for ACES stakeholders who have expressed an interest

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Description of personal data processing activities regarding stakeholders who have expressed an interest

Controller

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Purpose of the processing of personal data and description of the processing operations

In the ERASMUS+, ACES project, educational material on accounting and managerial reporting practices in the circular economy business models is being developed.

The processing of data from the affiliated groups and stakeholders allows us to contact those who have indicated to the ACES project implementing organisations that they are interested in the results and activities of ACES.

Collected personal data is used to enable the coordinator of the ACES project in Haaga-Helia UAS to

- Disseminate the knowledge produced by the ACES project partners regarding the accounting and managerial reporting practices in the circular economy business models to the data subjects.
- Disseminate information to ACES project stakeholders about upcoming targeted events and trainings to the data subjects.
- Invite the data subjects to closer cooperation
- Send out surveys to the data subjects to validate the interest and quality of ACES results
- Report on the interest shown by the data subjects in the project
- After the end of the project and approval of the final report, the data will be anonymised

The legal basis for processing operations is the consent of the data subject.

Lawfulness of processing of personal data

The lawfulness of processing personal data is based on the following principles of the EU General Data Protection Regulation: The data subject has given consent to the processing of his or her personal data for one or more specific purposes (GDPR Art. 6 (1)a);



Content

Personal data categories are: First Name, Last name, email, country, the preferred language for communication and Stakeholder group. Mandatory information to join the mailing list is the e-mail address and the country you associate in ACES context.

Data sources

Personal data are collected from the data subjects themselves, primarily through a web link to the questionnaire (webropol). Additionally, the data is also collected from professional networks.

Disclosure of personal data to third parties

Some, anonymized personal data may be disclosed to the project funder. Otherwise the data will not be shared.

Transfers and disclosures of data to outside of the EU or EEA

Data from the data file are not transferred to outside the EU or EEA, nor processed outside the EU or EEA

Period of storage of personal data

Personal data will be stored at least for the period of time required for the coordination of the ACES dissemination activities, but not longer than for the period required by the funder for archiving the project documents (estimated until the end of 2031).

Data security principles

Data is collected utilizing online survey and analysis software, webropol. Webropol is following ISO27001 security standard and the Finnish Katakri III security standard in all operations, including product development and in providing the Webropol SaaS service (Webropol data security white paper February 2023).

Data is collected utilizing webropol-program. At regular intervals during the project (until 30.6.2025), the data collected will be uploaded to a storage managed by the project coordinator and the data accumulated in Webropol will be deleted. The cumulative data will be merged into a single file. The e-mails will be added to LianaCloud Database. Liana cloud is a digital marketing and communications that hosts Haaga-Helia UAS's mailing lists. Only the ACES project team will use the e-mails of the people registered on this list in Haaga-Helia UAS.

Access to database and systems and use of the data file are only available to such employees of the controller or of subcontractors working on the controller's behalf, whose work duties entitle them to handle the data contained in the data file.

The database containing personal data is stored on a server which is placed in a locked facility that may only be accessed by specifically appointed persons whose work duties entitle them to do so. The server is protected by an appropriate technical security systems.



After the final report has been approved by funding agency, only paper copies of the databases will be used for archiving, and they will be stored in a closed, secure archive space.

LianaCloud privacy policy, please see <https://www.lianatech.com/privacy-policy.html>.

Rights of the data subject

The data subject has the following rights in accordance with the EU General Data Protection Regulation:

- The right to access their personal data.
- The right to withdraw the consent on which the processing operations are based at any time without giving any reason. However, the withdrawal of consent does not affect the lawfulness of the processing operations carried out on the basis of the consent before its withdrawal.
- The right to obtain from the controller, without undue delay, the rectification of inaccurate or incomplete personal data relating to the data subject and the right to obtain the completion of personal data which are incomplete for the purposes of the processing operations.
- The right to obtain from the controller the erasure of personal data concerning the data subject without undue delay, provided that
 - the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - the data subject withdraws the consent on which the processing was based and there is no other lawful basis for the processing;
 - the personal data have been unlawfully processed; or
 - the personal data must be erased in order to comply with a legal obligation to which the controller is subject under Union or national law.
- The right for the controller to restrict processing if
 - the data subject contests the accuracy of the data, in which case the processing will be limited for a period of time during which the controller can verify the accuracy of the data,
 - the processing is unlawful and the data subject objects to the erasure of the personal data and requests instead the restriction of their use; or
 - the controller no longer needs the personal data concerned for the purposes of the processing but the data subject needs them for the establishment, exercise or defence of legal claims.
- The right to receive personal data concerning him or her which the data subject has provided to the controller in a structured, commonly used and machine-readable format and the right to transmit such data to another controller without hindrance from the controller to whom the personal data have been provided, if the processing is carried out automatically.
- The right to lodge a complaint with the Data Protection Officer (DPO) if the data subject considers that the processing of personal data concerning him or her infringes the EU General Data Protection Regulation (guidance from the Finnish Data Protection Officer website at tietosuoja.fi).

This consent can be withdrawn By sending an e-mail to Controller's contact person regarding ACES project or to Controller's data privacy officer. Other requests for the exercise of data



subjects' rights are submitted to the controller in the first instance by using the electronic form on the Haaga-Helia website (www.haaga-helia.fi/tietosuoja).

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More information about the Erasmus+ programme: www.oph.fi/erasmusplus

The European Commission is not responsible for the content of this publication

More about ACES-project <https://www.erasmusaces.eu/>

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