



Privacy Notice for ACES stakeholders who have enrolled and/or participated in ACES events

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Description of personal data processing activities regarding stakeholders who have enrolled and/or participated in ACES events

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

In the ERASMUS+, ACES project co- founded by European Commission, educational material on accounting and managerial reporting practices in the circular economy business models is being developed. At events organised by ACES, the learning material is tested, disseminated and feedback is collected from the stakeholders.

The processing of data from stakeholders who have enrolled and/or participate in ACES events allows us to send information about the event person has registered at, send out possible follow-up questionnaires, to report project success to the funding agency and to archive participants' data for possible audits by the funder.

When data subjects are enrolling to the events, personal data is collected utilizing e.g. Webropol, Lytyi or any similar - software. At this stage, a consent is collected. The personal data categories except for the signature are collected at registration and the participation is confirmed e.g. by signature at the event. These two databases, registration personal data and participation data will be combined after the event. The personal data database is separate for each event. These datasets are combined only for the archive. After archiving, the data is only used to verify the project activities to the funder.

Data on participants in ACES events is shared and processed between the controllers mainly on a bilateral basis. Archiving of the data is the joint responsibility of the Controllers. The coordinator will build a comprehensive archive of the whole project, while the others will build an archive of their own activities only. If for example pictures photos, screenshots, videos and recordings with identifiable persons are used to communicate about the event, a separate permission is requested.

The legal basis for processing operations regarding stakeholders who have enrolled in ACES events is the consent of the data subject. Once the data subject has attended the event, they become a stakeholder who have participated in ACES events. For participants and those who receive event material, the requirements of the funder require longer-term storage of the data and the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party: The Grant agreement between European Union and Data controller (coordinator) obliges data controller to store the data of the actual participants. That is five years after the last payment of the project, estimated until the end of 2031.

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)
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (GDPR Art. 6 (1)(f))

Content

Personal data categories are: first name, last name, email, country, organization, target group category, signature or other proof of on-site presence accepted by the donor, photos, screenshots, videos, recordings and the input during the event



Data sources

The following categories of Personal data are collected from the data subjects themselves, primarily through a web link to the questionnaire (e.g. webropol or lyyti) and/ or during the event: first name, last name, email, country, organization, target group category, signature and the input during the event.

The following data categories are created and/ or collected and during the event by the event organisers: photos, screenshots, videos and recordings.

Disclosure of personal data to third parties

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 Lyyti Event Management System or similar. The Lyyti Event Management System is GDPR compliant. Program security standards and documentations have been created in accordance with the KATAKRI audit system criteria and ISO-27001 standard. KATAKRI is the security audit criteria used by the Finnish government bodies and authorities and ISO-27001 acts as a good basis for administrative security & risk management.

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.

In cases where the Lyyti or other software is not in use, the data is collected on paper forms. After the event, these forms are kept in locked cabinets in a secure area. The data will be transferred securely to Haaga-Helia, which will take them to the main project archive at the end of the project. Files containing personal data are transferred between controllers only when necessary and with special care.

Data will be used to report on the success of the ACES project activities to the authority funding the project: Finnish National Agency for Education (EDUFI) and European Education and Culture Executive Agency (EACEA). However, no personal data will be transmitted to these parties. However,



a potential auditor of these bodies may require the project coordinator to present the data as part of the accounting documentation.

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. Data containing personal information will be archived securely for a period of time specified by the funder. At the end of the retention period, the archive is deleted.

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.