

## The Foundation's data protection policy

- In accordance with EU's General Data Protection Regulation 2016/679 and national data protection legislation

### Data controller and contact information

Saara and Björn Wahlroos Foundation (1770070-8)

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("Foundation")

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### The data processor

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### Name of register

Register of grant applicants and recipients

### Purpose and legal grounds for processing personal data in the register

The foundation fulfills its purpose by granting grants based on applications. Personal data are collected for registers at the Foundation for various purposes: for processing grant applications, for processing, paying and reporting awarded grants. Processing personal data is justified by legitimate interest. The registrant's and the applicant's rights are guaranteed by the fact that no sensitive information is processed in the register. Data which entails specific risks, such as social security numbers and account numbers, is processed to as limited extent as possible.

### Content of the registers

The register stores information about the applicant or the applicant's contact person that has primarily been provided by the applicant.

Mandatory personal data for submitting the application:

- information that identifies the applicant (e.g. name, address, telephone, e-mail address, social security number/Business ID number, bank account number)

The applicant's own information about her/himself in the application, for example:

- register or curriculum vitae
- other documents and information that the applicant has attached to support the application
- any recommendations obtained with the applicant's consent
- other information needed for the application

If the applicant is granted a grant, the following information about the applicant is also stored in the digital register, for example:

- Account number
- Information regarding requisition and payment transactions
- Information about when decisions were made
- Information about any changes regarding the grant or withdrawal of grant
- Information on notifications to the Tax Administration

### **Data storage period**

The foundation saves applications for 10 years. The application as well as the material provided in relation to the application, both the applications that have been granted and the applications that have been rejected, have a large cultural history value for future research and foundation support and it gives us an opportunity to evaluate the effect of, and to develop, our contributions.

### **Regular disclosure of information**

- The applications are processed by the foundation's staff and elected officials and, if necessary, by external experts.
- All persons who have access to the data are bound by a duty of confidentiality.
- The right to see and update personal data is limited both on a personal level and in terms of time through the internal, centrally administered, rights of the data controller.
- In accordance with the Personal Data Act (523/1999) § 24, data can be disclosed to the Tax Administration.
- Information relating to granted applications can be disclosed in (rejections are not published):
  - publications
  - website (own website)
  - social media

Information may be disclosed to other funds and foundations if necessary. Information is only disclosed to the extent that it is relevant.

### **Data processors, release of data and transfer of data to outside the EU or the European Economic Area (EEA)**

The Foundation processes and stores personal data mainly from the EU or EEA area. However, the Foundation may use service providers also processing personal data from outside these areas. Your data will in that case be protected as required by the data protection legislation.

### **The principles for the publication of decisions and of personal data**

The Foundation reserves the right to publish the following information about all grant recipients:

- name
- the purpose stated in the application
- place of residence
- the size of the grant
- decision date

The decision to publish the data is based on a desire to maintain public confidence in the grant system and to avoid overlap in the allocation of funds for specific purposes.

The registrar does not issue statements or assessments regarding the applications.

### **Principles for protection of the registry**

In the processing of applications and data, it must be ensured that the applicants' privacy is not put at risk without authorization. The documents are only processed by those whose tasks require it. Those who process the data have a duty of confidentiality.

Applications, information and application attachments must be protected from outsiders.

Administrative password-protected access to the registry is granted only to named persons

### **Automatic processing**

The foundation does not use automatic decision-making processes. There are always several people who make the final decision.

### **Right to transparency**

- Everyone has the right to check whether they are in the foundation's register.
- Everyone has the right to check their own data in the register.
- The request to have the information released must be in writing and it must be signed by the person requesting to have their information released.
- The registrar has the right to ask the person who submitted the request to check their information to confirm their identity.
- The registrar protects the privacy rights of the applicants, evaluators and possible experts and thus does not issue statements concerning the applications.
- The request is answered within one month from its receipt to the above-mentioned contact person for questions regarding the register by e-mail.

### **Right to demand correction of an entry**

- An incorrect entry in the register must be corrected upon a specified request by a registered person.
- Specified requests must be addressed to the above-mentioned contact person for questions regarding the register by e-mail.

### **Right to request erasure**

You have the right to request that your personal data be deleted if:

- you object to the processing and there is no legitimate reason or legal basis for continued processing of the data.
- the processing of data that is unlawful.

As a result of legislation, the foundation is in many cases obliged to store personal data in order to, for example, fulfill a statutory obligation or handle legal claims.

### **Right to file a complaint**

The registered person has the right to submit a complaint to the supervisory authority if the latter considers that the processing of personal information is contrary to the EU's data protection regulation.