

# DATA PROTECTION AND PRIVACY POLICY APPLICABLE TO GRANT APPLICATIONS

## 1. Controller

Name: Helsingin Sanomat Foundation

Business ID: 2066823-5

Postal address: P.O. Box 367, 00101 Helsinki, Finland

## 2. Name of register

Grant system of the Helsingin Sanomat Foundation

## 3. Controller's contact person

Saila Linnahalme, Vice President, [saila.linnahalme@hssaatio.fi](mailto:saila.linnahalme@hssaatio.fi).

## 4. Purpose of and legal basis for personal data processing

The collected personal data is used for the processing of grant applications and awarded grants as well as communication, and to enable the monitoring and development of the functioning of digital services. The data stored in the register consists of the data given in grant applications and data related to the payout of awarded grants, the progress of research or a project and final reports.

For an application to be eligible for processing, the applicant is expected to give their personal data on the application form and in the appendices. Should the personal data be incomplete, the application may be left unprocessed.

The data collected in the system includes the applicant's contact details, members of the work group and the applicant's references. This data is collected from the person applying for a grant/another form of assistance. The data of the evaluators participating in the processing of grants and the Foundation's officers and the members of its Board of Trustees is collected directly from the parties concerned.

In addition, the Foundation collects the payout and payment data of grants/assistance as well as information on applicants' behaviour in the grant portal and related technical details, such as the log details of events. The Foundation also collects the system's internal communication between a data subject and the controller.

The data of a grant applicant and others involved in the application process is stored and processed based on their own consent.

## **5. Processors of personal data**

The personal data is processed by the Foundation's Vice Presidents and Office Manager, evaluators separately designated by the Foundation, the references named by the applicant, the Foundation's Board of Trustees, people providing technical support, designated users of an accountancy firm, auditors and other grant providers. The data is shown only to the extent necessary in terms of the recipient group's operations.

## **6. Protection of register**

Access rights to the register require a personal user ID. The main user also determines the level of access rights granted to users. Logging in to the system requires a personal password. The register's use and logins are monitored. The data is collected in the service's databases, which are protected by firewalls and other technical means. The databases are located in locked and guarded premises, and the data can only be accessed by certain pre-defined persons.

## **7. Storage period of personal data**

Users' user IDs and related personal data

- User IDs are stored if the user has applications at some point of a life cycle. If a user ID is found to be unused, it is deleted from the system. The Foundation checks the activeness of user IDs at the beginning of each calendar year. User IDs which have remained unused for two years are deleted.

Incomplete applications

- Applicants themselves can delete incomplete applications.
- The Foundation deletes incomplete applications when their storage is not necessary for awarding grants, although no later than at the beginning of the year following the application.

Non-awarded grants

- The Foundation deletes applications once their storage is no longer necessary for awarding grants, the compiling of statistics or research.

#### Awarded grants

- The Foundation deletes the applications pertaining to awarded grants once their storage is no longer necessary for awarding grants, the compiling of statistics or research.

#### Appendices to applications

- The Foundation deletes the appendices to applications when deleting the applications.

#### Payout data

- The data is stored for as long as necessary for reporting to the authorities and any possible audits.

#### Specification data

- The data is stored on a long-term basis for statistical purposes.

### **8. Data subject's rights and obligations**

Instructions for the holder of a user ID:

As an applicant for/the recipient of a grant, you can log in to the system and view all the data you have given and stored in the register by opening the application form's preview. To view and/or edit your current contact details, go to "Settings – Personal Data".

You have the right and obligation to correct any erroneous data. If you have any requests or questions pertaining to a matter, you can address them to the Foundation's Vice Presidents or Office Manager by sending an internal message in the system.

You have the right to cancel your application, in which case it will not be reviewed. If a decision on the application has already been made, the application's data cannot be entirely deleted from the system. You can export your application form from the system to yourself as a PDF file.

You have the right to have your data deleted from the register without undue delay, unless its storage is required for legal or public interest reasons.

You also have the right to lodge a complaint with the supervisory authority if you think your personal data has been processed incorrectly.

### **9. Disclosure of data**

Data on grants paid to natural persons is disclosed to the Farmers' Social Insurance Institution (Mela).

Data on grants paid to natural persons is disclosed to the Tax Administration.

The recipients and amounts of awarded grants and sometimes the abstracts and final reports of a research/project are published on the Foundation's website and in its Annual Report.

The Foundation may disclose data to other providers of grants/assistance.