

### Privacy notice to grant applicants

This notice contains information required in the Articles 13 and 14 of the EU General Data Protection Regulation.

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| <b>Personal data file</b>                                       | Grant application and award   |
| <b>Date:</b>  | 3 October 2018  |
| <b>Controller</b>   | Aalto University Foundation<br>Postal address: P.O. Box 11000, FI-00076 AALTO<br>Street address: Otakaari 24, 02150 Espoo<br>Tel.: (09) 47001 (exchange) 09 47001   |
| <b>The person in charge and contact person of the file</b>      | The person in charge and contact person of the file are specified in the grant call for applications.   |
| <b>Data protection officer and contact details</b>              | The Aalto University data protection officer is Jari Söderström.<br>Postal address: P.O. Box 11000, FI-00076 AALTO<br>Street address: Otakaari 24, 02150 Espoo<br>Tel.: (09) 47001 (exchange) 09 47001<br>E-mail: <a href="mailto:dpo@aalto.fi">dpo@aalto.fi</a>  |
| <b>Purpose and legal basis for processing the personal data</b> | <p>The personal data is processed for the following purpose:</p> <ol style="list-style-type: none"> <li>1. The Aalto University Foundation has restricted funds that are based on donations and intended for disbursing grants and scholarships, as well as travel grants and other types of financial aid as defined in the rules of each fund.</li> <li>2. Aalto University and its units may disburse or distribute other grants and scholarships, travel grants or other types of financial aid.</li> </ol> <p>The processing of personal data related to tuition fee scholarships, Erasmus grants and other grants awarded at the discretion of external authorities does not covered in this privacy notice.</p> <p>The processes of applying for and awarding grants and scholarships requires the university to process the grant applicants' and recipients' personal data in order to prepare the applications for decision-making, to award grants and</p> |

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|  | <p>scholarships and to pay them, as well as to monitor their payment and to make the associated statutory notifications to the relevant authorities.</p> <p>The purposes of processing the personal data are:</p> <ul style="list-style-type: none"> <li>- processing applications for grants and scholarships and paying them to the recipients, as well as communicating about them</li> <li>- complying with statutory obligations and authority guidelines, and</li> <li>- ensuring the security of services and investigating their misuse.</li> </ul> <p>Recipients of a grant awarded for artistic or scientific work lasting a minimum of four (4) months and being at least 1276.04 euros in amount (in 2018) is covered by the statutory pension insurance for farmers and recipients of grants and scholarships (MYEL).</p> <p>Below you will find a description of the legal bases for processing the personal data contained in this data file and examples of data processed on each basis.</p> <p><u>Performance of a contract or taking steps prior to entering into a contract:</u> The processing of personal data contained in this data file is primarily based on a contract and related to the data subject applying for or receiving a grant, grant payment and the university making the necessary notifications to the relevant authorities.</p> <p><u>Legal obligation:</u> The controller, i.e. the grant awarder, is obligated to notify the Finnish tax administration and the pension provider of the grant award and its recipient.</p> <p><u>Legitimate interest:</u> The personal data of the Aalto University staff, students, and possible reference/recommendation givers are processed based on a legitimate interest of the controller, which is also the legal basis for publishing the names of grant recipients. If the grant applicant provides Aalto University with the name and contact details of a third party, the grant recipient is responsible for informing the persons that their personal data have been disclosed to Aalto University.</p> |
| <p><b>A: Personal data collected directly from you</b></p>       | <p>Yes.</p>   |
| <p><b>B: Personal data collected elsewhere than from you</b></p> | <p>Yes.</p> <p>The university has a right to request for a reference regarding the applicant or retrieve information on his or her student or employee status from the personal data stored in the university records. The university has a right to obtain personal data of persons external to the university from public information systems.</p> <p>In case of grants or scholarships disbursed without application, personal data may be obtained from the university systems or in the case of persons external to the university, from public information systems.</p>   |
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| <p><b>Information contained in the personal data file (descriptions of categories of data subjects and those of personal data)</b></p> | <p>Basic information:</p> <ul style="list-style-type: none"> <li>- Name</li> <li>- As needed, student/employee/other status</li> <li>- Contact details: street address, e-mail address and telephone number</li> <li>- Degree</li> </ul> <p>Applicant details:</p> <ul style="list-style-type: none"> <li>- Applicant ID for grant applicant and grant recipient</li> <li>- Details on research and/or studies</li> <li>- Givers of recommendations/issuers of statements: Name, e-mail address</li> </ul> <p>Details on grant applications and grant processing:</p> <ul style="list-style-type: none"> <li>- Grant application and award, payment, monitoring of payment, notifying the relevant authorities of the grant payment</li> <li>- Grant amount, date of payment, receipt number, and description of grant.</li> </ul> <p>Identifiers required by authorities:</p> <ul style="list-style-type: none"> <li>- Personal ID code: recorded for the purposes of submitting the required monitoring reports to the tax administration and the pension provider.</li> </ul> <p>Bank details are requested separately in order to make the grant payment.</p> |
| <p><b>Recipients or categories of recipients of the personal data (= disclosure of personal data)</b></p>                              | <p>To process grant applications, Aalto uses primarily web-based services such as Webropol, Google Docs, Microsoft Office 365. Also other systems compliant with the Aalto University data security requirements may be used as a registration platform.</p> <p>Personal data may be disclosed, to the extent permitted by law, to authorities such as the Finnish tax administration and pension providers. The controller notifies the tax administration of the details of the grant recipient and the grant in the annual information returns, while also informing the Farmer's Social Insurance Institution (Mela) in accordance with the Farmer's Pension's Act (1280/2006) section 141b.</p>  |
| <p><b>Transfer of personal data to third countries</b></p>   | <p>The controller does not regularly transfer data contained in this data file outside the EU/EEA.</p> <p>The data protection policy of the university is to exercise particular care when transferring personal data outside the EU and the EEA to countries that do not offer the data protection required by the European General Data Protection Regulation (GDPR). Transfers of personal data outside the EU and EEA are done in accordance with the requirements of the GDPR.</p>   |
| <p><b>Period for which personal data is stored / Criteria used to</b></p>  | <p><u>Grant or scholarship recipients:</u> The controller shall keep information for at least six (6) years after the last instalment of the grant has been paid, or for a period defined in the university records management plan (TOS).</p>  |

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| <p><b>determine the period for which data is stored</b></p> | <p>The names and projects of grant recipients are stored permanently for scientific and historical research purposes.</p> <p><u>Grant applicants:</u> The personal data of rejected grant applicants and their recommenders are not processed for more than one (1) year as of the end date of the grant application period.</p> <p><u>Book-keeping material:</u> The controller shall keep book-keeping material for at least six (6) years after the accounting period has ended or for a period defined in the university records management plan (TOS).</p>   |
| <p><b>Rights of the data subject</b></p>                    | <p><b>Right of access</b></p> <p>You have a right to know what personal data are being processed of you and what data concerning you have been stored. The university provides you with your information upon request without undue delay. The requested information or the additional information related to the request must be provided no later than one month after receiving the request. If the information request is complex and comprehensive, the deadline may be extended by two months.</p> <p><b>Right to rectification of data</b></p> <p>You have a right to have any inaccurate or incomplete personal data concerning yourself rectified or completed without undue delay. In addition you have a right to have personal data erased from the data file when it is no longer necessary.</p> <p><b>Right to be forgotten</b></p> <p>Depending on the legal basis on which the data is processed, you may have a right to have your personal data erased from the data file of the school. This right shall not apply to cases where data processing is necessary for compliance with a legal obligation or for a task carried out in the exercise of official authority vested in the university. The storage and erasure of data shall comply with the records management plan of the university and the data storage periods required by legislation.</p> <p><b>Right to data portability</b></p> <p>You shall have the right to receive the personal data, which you have provided to the university, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the university. This right shall apply only to situations where the processing is carried out by automated means and is based on consent or contract.</p> <p>You can exercise your right by contacting the Aalto data protection officer (<a href="mailto:dpo@aalto.fi">dpo@aalto.fi</a>)</p> <p><b>The right to lodge a complaint with a supervisory authority</b></p> |

You shall have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data relating to you infringes the General Data Protection Regulation (EU) 2016/679. In addition, you have a right to use other administrative or judicial remedies.

You shall have the right to bring proceedings against the controller or the organisation processing your personal data before a court if you consider that the processing of your personal data infringes the General Data Protection Regulation.