Privacy notice for data subjects

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

<table>
<thead>
<tr>
<th>Name of the register:</th>
<th>Customer register of Aalto Startup Center</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date:</td>
<td>24 September 2020</td>
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</tbody>
</table>
| **Controller, contact person and person in charge of the register** | Aalto University Foundation  
Postal address: P.O. Box 11000, FI-00076 AALTO, Finland  
Street address: Otakaari 24, 02150 Espoo, Finland  
Tel.: (exchange) +358 9 47001  
Aalto Startup Center  
Marika Paakkala, Head of Aalto Startup Center |
| **Data protection officer and contact details** | Anni Tuomela, Data Protection Officer, Aalto University  
Postal address: P.O. Box 11000, FI-00076 AALTO, Finland  
Street address: Otakaari 24, 02150 Espoo, Finland  
Tel.: (exchange) +358 9 47 001  
Email: dpo@aalto.fi |
| **Purpose of the register, legal basis for processing personal data** | The purpose of the processing of personal data stored in this register is the administration of contractual matters involving the Startup Center and the customers using its accelerator services.  
The processing of personal data is subject to the Act on the Openness of Government Activities (621/1999) and legislation on data protection.  
Aalto Startup Center provides business acceleration services and collects customer data in order to sign agreements on acceleration services, manage said agreements and, upon their entry into force, implement the agreed services.  
The legal bases of the processing of personal data are the performance of a contract and a legitimate interest of the data controller. |
<p>| A: Is the personal data collected directly from data subject? | Yes |</p>
<table>
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<tr>
<th><strong>B: Is the personal data collected from another source than the data subject?</strong></th>
<th>No</th>
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</table>
| **Data contained in the register (description of the categories of data subjects and the categories of personal data)** | The personal data processed is limited to what is necessary. Such data includes but is not limited to:  
  **Name of company**  
  Names of the company and team members  
  Email addresses  
  Telephone numbers  
  Addresses  
  Period of validity of the agreement  
  Date of expiration of the agreement |
| **Recipients or categories of recipients of the personal data (i.e. disclosure of personal data)** | Personal data is processed only by those Aalto University employees or those contracted individuals working on behalf of Aalto University who have a right to process the data.  
  The contact information is regularly disclosed to the Aalto University alumni and partner register (CRM). |
| **Transfer of personal data to third countries** | The data protection policy of the university is to exercise particular care if transferring personal data outside the EU and EEA to countries that do not offer the level of 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. |
| **Period for which personal data is stored / Criteria used to determine this period** | The periods for which personal data saved in systems and manual material are stored are based on the law and the Records Management Plan of Aalto University.  
  In line with the university’s Records Management Plan, personal data will be stored for the duration of the customer relationship (the period of validity of the agreement) and a minimum of six (6) years after the end of the customer relationship or even a longer time if required by a project financer. |
| **Rights of the data subject** | The data subject has the right to access their personal data. Requests for access should be sent to startupcenter@aalto.fi.  
  The data subject has a right to demand the rectification of inaccurate personal data concerning him or her. The data subject may demand rectification by sending an email to startupcenter@aalto.fi. |
The data subject has the right to bring matters concerning the lawfulness of the university’s data protection operations to the Office of the Data Protection Ombudsman for evaluation by sending an email to tietosuoja@om.fi.