

## Data protection description for research

In accordance with EU General Data Protection Regulation (2016/679, "GDPR") and applicable national legislation (including Finnish Data Protection Act 1050/2018).

### 1. Name and duration of the research

Name of the research: SFINNO Finnish Innovation (SFINNO Suomalainen innovaatio)

Duration of the research: This is a continuous research activity on Finnish innovation activity that is implemented in different projects. Research has started in 1998.

### 2. Controller(s), data protection officer(s) and contact person(s)

Name: VTT Technical Research Centre of Finland Ltd. ("VTT"), Business ID: 2647375-4

Address: Tekniikantie 21, 02150 Espoo, Finland

Data protection officer (DPO) of VTT:

Name: Seppo Viinikainen

Address: VTT Technical Research Centre of Finland Ltd., Koivurannantie 1, 40400 Jyväskylä, Finland

E-mail: [Seppo.Viinikainen@vtt.fi](mailto:Seppo.Viinikainen@vtt.fi) (DPO) or [dataprotection@vtt.fi](mailto:dataprotection@vtt.fi) (DPO, data security, HR manager and legal counsel)

Contact person or responsible research group of the research:

Name: Sari Vainikainen

Address: VTT Technical Research Centre of Finland Ltd., Tekniikantie 21, 02150 Espoo, Finland

E-mail: [sfinno@vtt.fi](mailto:sfinno@vtt.fi)

If personal data is used in research implemented in collaboration with a third party, potential separately announced research partners can be joint controllers related to a particular research.

### 3. Personal data categories

Personal data categories: Name of survey respondent, position in organization, organization e-mail.

Data subject categories: Survey respondents are organisations' representatives who have been involved in innovation development, commercialisation or introduction, and they have been identified from professional journals or public annual reports of research and development intensive companies.

### 4. Purpose and legal basis of processing

Purposes of personal data processing are

- 1) to reach organisation's representatives who have been involved in innovation development, commercialisation or introduction, and who have been identified from professional journals or

public annual reports of research and development intensive companies, to collect supplementary information about issues related to innovation process and commercialization.

- 2) to conduct research that deals with development of innovation activity in Finland and is implemented in different projects.

Legal basis of processing<sup>1</sup>:

- 1) To reach survey respondents: Legitimate interests pursued by the Controller(s) or by a third party: VTT's legitimate interest to maintain and update information about Finnish innovations, which have been identified from professional journals or public annual reports of research and development intensive companies. Person register only includes personal data of organisation's representative involved in innovation development needed to carry out the survey.
- 2) Research: Performance of a task carried out in the public interest, scientific or historical research purposes or statistical purposes

## 5. Data sources

Personal data is received from published innovation articles or public annual reports of research and development intensive companies. If articles do not mention personal data, this data is collected from public sources of organisation responsible of innovation development (upper management of organization, e.g. chief technology officer, research manager, chief executive officer). Survey respondent's email has been collected from organisation's home page.

## 6. Recipients or categories of recipients

VTT may use Microsoft's O365 tools, such as Teams, in processing of personal data in the research. As a main rule, VTT does not otherwise provide personal data to third parties.

In specific research projects, VTT can provide personal data to research collaborators, if it is necessary to implement the research. Such research partner can be joint controller related to a particular research when separately announced. The data is provided with appropriate arrangements complying GDPR and other applicable legislation, including among others informing obligation.

## 7. Transfers outside the European Union or the European Economic Area

Personal data may be transferred outside European Union or European Economic Area in accordance with transfer mechanisms set forth in GDPR Chapter V, including standard contractual clauses and adequacy decision. This applies especially to Microsoft's O365 environment.

## 8. Retention period of personal data after the research

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<sup>1</sup> GDPR Art. 6 and Finnish Data Protection Act 4 §.

Personal data is stored as long as described research activity is on going. If research ends, data is stored five (5) years after the termination of the latest project.

Research data is stored at server under VTT's administration.

## 9. Protection principles

In performance of research, research data:

is pseudonymised

Personal data processed in data systems is protected with:

multi-factor authentication (MFA)

access control with IP address

Encryption method of data transmission:

in transmission: data transmission protection complies with VTT's information security guidelines.

for data file: user name and password

## 10. Rights of the data subjects

The data subjects have the following rights, which however may be exempted from and/or not applied in particular in research on grounds set forth in applicable legislation. Exemptions and restrictions are considered for each case separately.

**The data subject can exercise these rights by contacting Controller with information set forth in section 2, preferably by email.**

### **Right of access**

The data subjects have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed and access to his or her personal data and information concerning the processing of his or her personal data.

### **Right to rectification**

The data subjects have the right to obtain from the controller rectification of inaccurate personal data concerning him or her. The data subjects have the right to have incomplete personal data completed.

### **Right to erasure**

The data subjects have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay.

### **Right to restriction of processing**

The data subjects have the right to obtain from the controller restriction of processing.

**Right to object**

The data subjects have the right to object to processing of personal data concerning him or her. In particular, person has a right to object to processing which relates to the controller's legitimate interest.

**Right to lodge a complaint with a supervisory authority**

The data subjects have a right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data breaches the data subject's rights pursuant to applicable law. In Finland: Finnish Data Protection Ombudsman, Lintulahdenkuja 4, 00530 Helsinki, P.O. Box 800, 00531 Helsinki, Finland, [tietosuoja@om.fi](mailto:tietosuoja@om.fi)