

# Privacy Notice

This Privacy Notice follows the EU General Data Protection Regulation (GDPR) and the national data protection law for a data subject such as for the controller's customer, employees and for the supervisory authority.

## **Controller and its contact information**

The Foundation of Nokia Corporation sr

Postal address: P. O. Box 226, FI-00045 NOKIA GROUP, Finland

## **Controller's contact person**

Officer of the Nokia Foundation Leena Tanner

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Telephone: +358 (0)50 522 0172

## **Name of the personal data register and data subjects**

The Nokia Foundation's personal data register for grants (and scholarships)

Data subjects in the Nokia Foundation's personal data register include grant applicants, grantees and reviewers as well as the references, supervisors and hosts of applicants.

## **Purposes of personal data processing and legal basis for processing**

The Nokia Foundation awards grants. Applying for and granting scholarships require processing of personal data of the grant applicants, grantees and reviewers as well as references, supervisors and hosts indicated by the grant applicants. The Nokia Foundation is the controller that processes data in the personal data register to prepare grant applications for decision-making of the Nokia Foundation's Board, to award grants based on the decision by the Board as well as for payout of the grants. Furthermore, the controller processes data in the personal data register to monitor grant use and to send statutory notifications to the authorities.

The purposes of personal data use include:

- processing grant applications and payout of grants, including communication related to grants,
- production and delivery of grant application services, and development and quality assurance of grant services,
- fulfilling statutory obligations and any other official rules and regulations,
- ensuring the security of services and investigating abuses.

The Nokia Foundation processes personal data on the following legal bases: Contractual relationship or actions preceding the conclusion of a contract, statutory obligations and legitimate interests.

**Categories of personal data**

Basic information of an applicant:

Name, age, postal address, email address, country of citizenship, country of residence, current main occupation, telephone number, local tax office and academic degrees.

Contact information of a reference:

Name, position, work place, phone number and email address.

Applicant details:

Number of the grant application.

Information pertaining to applicant's research/project/visit:

Title, schedule, institution, supervisor/host, objectives and other descriptions as well as appendices.

Agreement information:

The controller's and grant applicants'/grantees' agreement information including assurances of given consents of references, supervisors and hosts.

Event information related to grant applications:

Tasks and events related to managing grant applications: Applying for a grant, evaluating applications, giving a grant, paying a grant, monitoring payout and controlling grant reporting as well as sending grant notifications for the authorities.

The controller saves to the personal data register the information provided in the grant application, information in managing grant applications and information related to the payout of given grants (bank account details, personal ID code, grant amount and payout date).

A grant applicant is obliged to verify if the references, supervisors and hosts mentioned in the grant application give their consent for saving their personal data (contact information) in the personal data register.

Technical information of the use of the personal data register (i.e. user's log data consisting of IP address, type of a web browser and version of the operating system of a computer) and all inside communication between registered and the controller in the personal data register are saved.

The personal ID code is registered for sending the supervision material to the Tax Administration and for sending material to the Farmers' Social Insurance Institution (Mela) that handles the statutory earnings-related pension and occupational accident insurance of those receiving a grant or a scholarship from Finland.

**Recipients and recipient groups of personal data**

On behalf of the controller, persons who are entitled to handle personal data by virtue of their work (such as the officer, references, reviewers and the Board) do so. The controller uses suppliers (for technical support, for banking to take care of grant payouts, for bookkeeping and for auditing) which process personal data for its accounts. The controller concludes appropriate agreements on personal data processing with such suppliers. Persons responsible for processing applications are bound by a confidentiality obligation.

For fulfilling the statutory obligation, the controller notifies the tax office of the grant electronically and Farmers' Social Insurance Institution (Mela) of detailed information related to the grantee and the grant.

On the Nokia Foundation's website and in its annual report, the controller publishes grantees' names, grant amounts, titles of the grants/studies as well as potentially also abstracts of the grants/studies.

As a rule, the controller does not transfer data in this data register outside of the EU/EEA.

**Personal data retention period or criteria for determining the period**

Unfinished grant applications:

The applicant can erase his/her unfinished applications from the register. The controller erases or anonymises unfinished applications with their appendices within 12 months from the Board's decision date of the given grants.

Grant applicants:

Unless a grant is given, the controller will process the personal data of grant applicants as well as their applications' reviewers and references/supervisors/hosts for no more than 12 months from the Board's decision date of the given grants.

Grantees:

The controller will process the grantees' personal data (including reviewers' evaluation information and information of references, supervisors and hosts) as long as the research project lasts and retain the data until the end of the grant payout as well as all obligatory reports of the grant use are accepted. The controller will erase or anonymise all other data except the following items of personal data within 12 months in accordance with the erasure processes it follows. The following personal data retains in the register forever: name of the grantee, title of the research/project/visit, grant amount, abstract, type of the grant and year of giving the grant. If the controller expects temporary or final report of the grant use, also that report retains in the register.

Grant payment:

Information on paid grants is retained to fulfill statutory obligations given by authorities by law (such as tax, Mela, accounting, auditing).

#### Communication:

All communication saved in the data register concerning an application is removed when that application is erased or anonymised.

#### Register's usernames and personal data related to them:

If a data subject registered in the data register does not have any grant application in the process and the data subject's username has been disused for the last 15 months, the username will be removed from the register. Username is retained in the data register if a registered data subject has an application in the process.

#### **Personal data sources and updates**

Personal data is collected from grant applicants, grantees and reviewers as well as from the references, supervisors and hosts indicated by the applicant.

#### **Data subject's rights**

Data subjects have the right to log in the personal data register with a username and a password. As registered grant applicant, the data subject can see all information they have given in the personal data register by opening the preview of the application. The data subject can see and change their contact information in **Settings – Personal information**. The data subject can transfer the saved grant application from the register electronically in pdf-format to other devices.

Data subjects have the right and responsibility to correct erroneous information in the data register. All requests or questions should be sent to the contact person of the controller as an inside message in the data register.

Data subjects have the right to receive the controller's confirmation of whether their personal data will be processed or not, or whether they have already been processed. If the controller processes a data subject's personal data, the data subject has the right to receive the information in this document and a copy of the personal data being processed or already processed (according to previously stated time limits of retaining the data). However, the data subject does not have the right to receive data saved by reviewers and references or data saved for statistics, evaluation of impact and research purposes.

If a data subject does not want to write a grant application, they do not need to send it and a data subject can remove the unfinished application. A data subject can also ask for the removal of their username or their grant application from the contact person of the controller. The data subject has the right to request the controller to rectify or erase their personal data and prohibit the processing of their personal data in the application process. However, if the Board has already given the decision of the grant application, not all personal data can be erased from the personal data register.

All of the above requests must be submitted to the above mentioned contact person of the controller.

If a data subject considers that his/her personal data is not processed legally, he/she has the right to file a complaint with the supervisory authority.

### **Protection methods regarding the data register**

The controller processes personal data securely and in a manner fulfilling the requirements of applicable laws. It has carefully assessed the risks that may be associated with the processing and taken the necessary measures to manage these risks.

The controller has protected the data appropriately in technical and organisational terms. The data register is protected using, for example, the following tools:

- Protection of equipment and files
- User identity verification
- Access rights
- Registration of usage events
- Processing guidelines and supervision

An access to the data register requires a personal username. The administrator defines the level of access for each user. Logging in the data register requires a personal password. Data subjects' linkage to the register is protected by SSL encryption. Use of the register and logging in to the register are monitored. Data is stored in databases, which are protected, by firewalls, passwords and other technical methods. Databases and non-electronic material are stored in locked, technically access-controlled areas. Access to the personal data register is restricted to designated persons.

When processing personal data, no automated decision-making or profiling is performed.

The controller also requires that its suppliers and other partners ensure appropriate protection of the personal data to be processed.

### **Changes to this Privacy Notice**

The controller may update this Privacy Notice and communicate the changes on this site. The Nokia Foundation reserves the right to change and modify this Privacy Notice from time to time. When the controller post changes to this Privacy Notice, it will modify the "Effective Date" at the top of this Privacy Notice to indicate when such changes have come into effect.

### **Use of cookies and similar techniques**

Cookies are small text files, which the browser inserts into a computer or other device while you use the website of this grant system.

Thus, cookies are small files stored on the users' computers by the service provider's web servers. In practice, a cookie is a small, unnamed user-specific text file, which is stored on the user's web browser. The server can later read the cookie and thus the server can later be recognized (e.g. upon the user's return to the site). Solely the server that has stored the cookie can later use the cookie. The users cannot be recognized, and no damage can be done on the user's device. The cookies are per se divided into session-specific and permanent cookies. Session-specific cookies expire when the user finishes using the web-service. Permanent cookies are stored in the browser for a specific amount of time or until the user deletes them. The cookies help the website's use and enable certain functionalities, such as remembering sessions, the website's user-based personalization, and simple recognition to the service. We use cookies to enable our service's functionalities. With cookies, we can also collect information on the website's visitors' terminal devices and web browser. The collected information can be used to find solutions to problem situations. The cookie contains only an individual, session-based identifier, which enables the recognition of the web browser visiting the website. By using our website, you are consenting to the above-mentioned use of data processing. You may also block the usage of cookies, but it may have severe drawbacks as cookies are the technical solution in the execution of the browsers' and www-servers' communication protocols and the grant system does not work properly without cookies. More information on browser-specific instructions can be found in the browsers' own instructions. Many browsers have the option to block cookies from third parties. In this case, the browser only accepts cookies coming directly from the web-service in use. The function is performed under the browser's settings (block all third party cookies) or with the help of Your Online Choices -website (the option to define what to block per company).