



# Ministry of Education and Culture Privacy Notice to Data Subjects

Personal data processed in the online services related to discretionary government grant activities

## 1 General information

This privacy notice contains the information to be provided for the data subject (a natural person) required under Articles 13 and 14 of the EU General Data Protection Regulation (EU) 679/2016. Data subjects are provided with this privacy notice when personal data is collected.

## 2 Name and contact details of the controller

Ministry of Education and Culture  
Street address of the Registry: Ritarikatu 2 b, Helsinki  
Postal address: P.O. Box 29 FI-00023 GOVERNMENT  
Email address: kirjaamo.okm@gov.fi  
Tel. +358 295 16001 (Government switchboard)

## 3 Joint controller and contact details of joint the controller

State Treasury  
Street address: Sörnäisten rantatie 13, Helsinki  
Postal address: P.O. Box 14, FI-00054 STATE TREASURY  
Email address: kirjaamo@valtiokonttori.fi  
Tel. +358 295 50 2000 (State Treasury switchboard)



## 4 Contact details of the data protection officer

Data Protection Officer at the Ministry of Education and Culture

Email address: okmtietosuojavastaava@gov.fi

Postal address: Ministry of Education and Culture, P.O.Box 29,  
FI-00023 GOVERNMENT

Data Protection Officer at the State Treasury

Email address: tietosuojavastaava@valtiokonttori.fi

Postal address: State Treasury, P.O. Box 14, FI-00054 STATE TREASURY

## 5 Purposes of processing personal data

### I. **Responding to customer feedback (email and feedback form):**

The contact details provided by the customer are only used for responding to feedback. The State Treasury answers questions related to the service and to technical problems.

### II. **Supporting authorities involved in government grant activities:**

The contact details of the government grant authorities are used by the State Treasury to manage customer relations and access rights.

### III. **Provision of discretionary government grant services:**

The data provided by the customers is used when processing discretionary government grants (for purposes such as requesting additional information, assessing and comparing applications, and making decisions). This data is primarily used by those government grant authorities that have opened calls for government grant applications. The State Treasury and the government grant authorities are the joint controllers of this data. The State Treasury processes the data as part of its tasks related to the technical maintenance of the service (including log management).



IV. **User IP address:**

Technical log data is collected on the use of the website and related APIs, and the data is used to verify the website's operations and to investigate potential incidents.

V. **Tutkiavustuksia.fi service:**

The State Treasury collects minimum information on grant decisions and on calls for grant applications. In this connection, data on grants paid to private individuals is also collected. The data collection is based on the Act on Discretionary Government Grants (688/2001) and the decree based on the Act (1394/2022). Details of the grants awarded to private individuals are published if the grant awarded exceeds EUR 1,000.

## 6 Basis for processing personal data

The processing of personal data is based on the following:

- Act on Discretionary Government Grants (688/2001)
- Government Decree on the Ministry of Education and Culture (310/2010)
- Government Rules of Procedure (262/2003)
- Archives Act (831/1994)
- Act on Information Management in Public Administration (906/2019)
- Government Decree on the minimum information to be stored in the data repository for government grant activities and on the datasets to be published in the service for publishing and using government grant information (1394/2022)

The legal basis for personal data processing is provided in accordance with Article 6(1)(c) of the General Data Protection Regulation (compliance with statutory obligations).



## 7 Categories of data subjects and categories of personal data to be processed

### I. **Feedback providers:**

Information submitted by the provider of the feedback, generally an email address and name, possibly a telephone number. The State Treasury uses the information to respond to the feedback. The State Treasury is the controller and processor of the register.

### II. **Government grant authorities:**

Contact details of persons acting in different roles as government grant authorities. The State Treasury is the controller and processor of the register.

### III. **Parties applying for discretionary government grants:**

The following personal data on the parties applying for government grants is stored or used:

- i. name, personal identity code and contact details of the contact person and their role in the applicant organisation
- ii. contact person's authority to act on behalf of different organisations
- iii. data collected using the application forms and related appendices drawn up in connection with various calls for government grant applications.

### IV. **User IP address:**

The user's IP address is stored in the technical log data. The State Treasury is the controller and processor of the register.

### V. **Tutkiavustuksia.fi service:**

The information referred to in section 2 of Decree 1394/2022, such as the applicant's name and personal identity code, and the grant applied for and awarded.



## 8 Sources for personal data when unavailable from the person concerned

### II. **Government grant authorities:**

The data is obtained from the central government's shared data resources and the government grant authorities.

### III. **Parties applying for discretionary government grants:**

The data is in part obtained from the Business Information System (BIS) and Suomi.fi (identification and authorisation).

### IV. **User IP address:**

Technical logs are stored on the system log server, where they are available for incident resolution.

### V. **Tutkiavustuksia.fi service:**

The data is obtained from the government grant authorities, through government grant services or from the register of business support (Y-ATV).

## 9 Processors and recipients of personal data

- State Treasury, service provider and joint controller
- Nordcloud, system maintenance
- Government ICT Centre (Valtori), service platform
- Digital and Population Data Services Agency
- Finnish Government Shared Services Centre for Finance and HR

Only personal data that is expressly provided for publication under section 32d of the Act on Discretionary Government Grants is published in the Tutkiavustuksia.fi service.



## 10 Transferring personal data outside the EU or the EEA or to international organisations

No personal data is transferred outside the EU or the EEA or to any international organisations.

## 11 Personal data retention periods

### I. **Customer feedback:**

The data is only stored for the period required to process the customer's case. Any unnecessary contact details are deleted every 6 months. The State Treasury is responsible for deleting the data.

### II. **Information on government grant authorities:**

The data is stored in the system for discretionary government grants and the customer relationship management system (CRM) for the duration that the service remains in operation under the State Treasury.

### III. **Information on the parties applying for a discretionary government grant:**

The data is stored in the data repository for discretionary government grants, where it is stored according to the retention period determined by the government grant authority. Government grant applications, decisions and reports and their appendices are stored in the Hallinnoivastuksia.fi service for either 5 or 10 years. The data storage period is determined in accordance with section 32e of the Act on Discretionary Government Grants. On a case-by-case basis, personal data contained in documents and metadata may be transferred to the National Archives for archiving in accordance with the National Archives' screening decisions.



IV. **User IP address:**

The State Treasury stores the data for 90 days.

V. **Tutkiavustuksia.fi service:**

The data storage period is determined in accordance with section 32e of the Act on Discretionary Government Grants.

## 12 Data subject rights

Data subjects have the right to be informed by the controller of whether or not their personal data is processed.

Data subjects also have the right to request:

- access to personal data concerning them
- correction or erasure of personal data which is inaccurate or out of date
- restriction of the processing of personal data.

Data subjects who believe that their personal data is not being processed on a lawful basis have the right to lodge a complaint with the Data Protection Ombudsman.

## 13 Automatic decision-making and profiling

The personal data is not used for automated decision-making or profiling that would have an effect on the data subjects' rights or freedoms.

## 14 Protection of personal data

In its capacity as the controller, the Ministry of Education and Culture has taken the necessary technical and organisational measures to ensure that the data is secure and also requires this of the processors of personal data.