



# Data protection notification of the Ministry of Education and Culture on verifying the data of beneficial owners and beneficiaries for data subjects

Personal data processed when verifying the data of beneficial owners and beneficiaries of organisations that have received funding from the European Union's Recovery and Resilience Facility

## 1 General information

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

## 2 Data controller and contact information

Ministry of Education and Culture  
Postal address: PO Box 29, FI-00023 GOVERNMENT  
Email address: registry.okm(at)gov.fi  
Tel. +358 295 16001 (Government switchboard)  
Government distribution centre: Ritarikatu 2 B, Helsinki

## 3 Contact information of the data protection officer

Data protection officer of the Ministry of Education and Culture  
Email address: okmtietosuojaavastaava(at)gov.fi  
Postal address: Ministry of Education and Culture, PO Box 29, FI-00023 GOVERNMENT

## 4 Purposes of processing personal data

The purpose of the processing is to fulfil the obligations agreed to protect the financial interests of the European Union. To protect the financial interests, the names of the final recipients, contractors and subcontractors of the funding, and data on the beneficial owners and beneficiaries of the final recipients and contractors are required for the purposes of supervision and inspection.

## 5 Legal basis for processing personal data

The processing of personal data is based on the following:

- Act on Discretionary Government Grants (688/2001)
- The Act on the Administration, Supervision and Inspection of the European Union's Recovery and Resilience Facility (537/2022).
- Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility (RRF Regulation)
- Act on Preventing Money Laundering and Terrorist Financing (444/2017)

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

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

Categories of data subjects:

- Final recipients of the grant and beneficial owners of companies and organisations

Categories of personal data (personal data processed):

- First name
- Last name
- Date of birth

## 7 Sources of personal data

Personal data is usually collected from the data subjects themselves or from their contact persons. For the purposes of verifying the data, which is based on statutory supervision with regard to the RRF Regulation, the personal data are retrieved from the Virre Information Service of the Finnish Patent and Registration Office.

## 8 Processors and recipients of personal data

The authority granting the financial resources, i.e. the Ministry of Education and Culture, is responsible for ensuring that the data delivered to the State Treasury is comprehensive and correct and meets the content requirements of the State Treasury's centralised information system.

The State Treasury is tasked with maintaining a centralised national information system for monitoring projects financed using funds from the Recovery and Resilience Facility. The data referred to in section 6 of these instructions is collected into the centralised information system. The State Treasury also acts as the controller of the information system.

Recipients of personal data:

- The State Treasury is responsible for the administration, supervision and inspection of the European Union's Recovery and Resilience Facility.

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

No personal data is transferred outside the European Union or the European Economic Area or to any international organisations.

## 10 Personal data retention periods

The data will be stored until the end of 2032 in accordance with section 18 of the Act on the Administration, Supervision and Inspection of the European Union Recovery and Resilience Facility.

## 11 Data subject rights

Data subjects have the right to be informed by the controller of whether 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.

## **12 Automated decision-making and profiling**

Personal data is not used for automated decision-making or profiling that might have an impact on the rights or freedoms of data subjects.

## **13 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.