

## Kira Circularis Privacy Policy

Data Protection Act 2018/1050, EU General Data Protection Regulation 2016/679.

The Privacy Policy contains the information that must be disclosed to data subjects when processing personal data. The privacy statement helps to ensure the controller's accountability. The onus of proof is a key principle of the GDPR and means that the controller must be able to demonstrate its compliance with data protection legislation.

### **1. The controller**

South-Eastern Finland University of Applied Sciences,  
Patteristonkatu 3, Mikkeli

### **2. Contact person for matters concerning the register**

Saku Penttinen  
Vipusenkatu 9  
57200 Savonlinna  
+358503555540  
firstname.lastname@xamk.fi

### **3. For what purpose is my personal data processed?**

To contact you in connection with the project. As part of the project activities and for the implementation of the research, development and innovation activities of the UAS. For marketing the project and informing the target group. To manage stakeholder and customer relations, to communicate project activities and results.

### **4. On what basis is my personal data processed?**

The grounds for processing personal data are based on public interest (scientific research and research, development and innovation activities of universities of applied sciences).

The processing of personal data in scientific research is based on the EU General Data Protection Regulation and the national data protection law. Scientific research is a task of public interest within the meaning of the GDPR, whereby scientific research of public interest is the basis for processing personal data (Data Protection Act). In the Data Protection Regulation (recital 159), the concept of research also covers RDI activities.

### **5. Name, nature, duration and performers of the research or project**

Kira Circularis- Products, services and innovations of the circular economy in the real estate and construction sector

Promoting innovation in the circular economy  
1.4.2026-31.3.2026

**Xamk project team TP4:**

Saku Penttinen  
Fanny Malmstedt  
Lauri Tienhaara  
Noora Siitonen

**5. Parties involved in the collaborative research and division of responsibilities**

Metropolia, Main responsibility  
Turun Amk, Co-implementer  
Tamk, Co-executor  
Oamk, Co-implementer  
Karelia, Co-producer  
Xamk, Co-producer

**6. What kind of information about me will be processed?**

Name, e-mail address, organisation, education and telephone number

**7. From which sources is my data collected?**

Only from the individual and from public organisations' websites. Permission will be sought from each publication.

**8. Will my personal data be disclosed to third parties?**

As a rule, no information is disclosed to third parties. Data may be published to the extent agreed with the data subject. Certain information may be disclosed to the project funder in the context of reporting on issues required by the funder, e.g. lists of participants in events.

**9. Will my data be processed outside the EU or EEA?**

No data will be transferred by the controller outside the EU or EEA.

Xamk uses Microsoft cloud services (Teams and OneDrive) for storage.

As a rule, Microsoft processes data in the EU/EEA and in regional data centres. Microsoft is committed to complying with the EU General Data Protection Regulation. The Microsoft Privacy Statement can be found at: <https://privacy.microsoft.com/fi-FI/privacystatement>

## **10. How long will my data be stored?**

Personal data will be kept for the duration of the project and for as long as there is still a need to use it. For project activities, personal data will be kept for the archiving period required by the funders. Project files and materials that may also contain personal data will be archived according to Xamk's policy: for EU projects, the retention period is 10 years from the end of the programming period.

## **11. How will my personal data be protected?**

Your personal data is stored in an information system. Users have personal user IDs. Only data controllers who are entitled to access and use the system by virtue of their job are allowed to do so.

Customer and stakeholder data are stored in a customer management system, where data maintenance is protected by an AD ID and password. The data stored in the system are accessible by a restricted group of users with user rights.

## **12. How can I exercise my rights under the GDPR?**

Subjects / data subjects can make any request related to this research to the contact person listed below.

Saku Penttinen  
Vipusenkatu 9  
57200 Savonlinna  
+358503555540  
firstname.lastname@xamk.fi

Where the ground for processing is the public interest, the data subject has the following rights:

- the right to be informed of the processing of personal data, unless an exception is expressly provided for by law
- The right of access to the data
- The right to rectify the data
- The right to have the processing of personal data restricted, unless the data subject has the right not to be informed unless the information is exempted from the law.
- the obligation to notify the rectification or restriction of processing of personal data



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- the right to object to processing
- the right not to be subject to automated decision-making without legitimate grounds