



South-Eastern Finland
University of Applied Sciences



Co-funded by
the European Union



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Privacy statement for the project ETKOT - South-Savo Artificial Intelligence at Memory Lab

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

This document clarifies and specifies the information on the processing of personal data on a research or project-by-project basis. The privacy statement helps ensure the data controller's obligation to demonstrate compliance. Demonstrating compliance is a key principle in the data protection regulation, meaning that the data controller must be able to prove that they adhere to data protection act.

1. Registrar

South-Eastern Finland University of Applied Sciences
PL 68 (Patteristonkatu 3), 50101 Mikkeli
Phone +358406550555
Business ID: 2472908–2

Joint registrar:

National Library of Finland
Saimaankatu 6, 50100 Mikkeli
Phone 029419112902941 911 41 911
Business ID: 0313471–7

2. Contact person for register matters

Tanja Hokkanen, project manager
South-Eastern Finland University of Applied Sciences
Patteristonkatu 2, 50100 Mikkeli
+358504659352
tanja.hokkanen@xamk.fi

Liisa Näpärä, project manager
National Library of Finland
Saimaankatu 6, 50100 Mikkeli
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liisa.napara@helsinki.fi

3. What is the purpose for which my personal data is processed?

Scientific research is one of Xamk's basic tasks. Personal data is processed in managing stakeholder and customer collaboration within the project and in communicating about the project's activities and results. Personal data is collected during surveys and events organized

within the project, such as workshops, to enable follow-up communication with participants for providing or obtaining additional information and to foster collaboration.

The processing of personal data is based on the information provided by the participant when participating in the project activities and the information collected for the funder in accordance with the funder's instructions.

4. On what basis is my personal data processed?

The basis for processing personal data is the public interest (scientific research and the research, development, and innovation activities of universities of applied sciences).

The processing of personal data in scientific research is based on the general EU data protection regulation as well as national data protection law. Scientific research is a task **in the public interest** within the meaning of the Data Protection Regulation, in which case scientific research in the public interest is the basis for the processing of 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 study or project

Project name: ETKOT – South-Savo Artificial Intelligence at Memory Lab

Nature: Development project

Project duration: 1.9.2024 – 31.12.2025

Performers: Project staff at South-Eastern Finland University of Applied Sciences (Xamk), National Library of Finland and Central Archives for Finnish Business Records (ELKA).

ETKOT - South-Savo Artificial Intelligence at Memory Lab project is Co-funded by the European Union. The funding has been granted by the South Savo Regional Council.

The project will be implemented as a joint project between Xamk, the National Library of Finland and Central Archives for Finnish Business Records (ELKA).

5. Parties of the development project and division of responsibilities

Xamk: Project communication, information, coordination and reporting, project events such as organisation and marketing of workshops, implementation of stakeholder and feedback surveys, and dissemination of information about project results.

National Library of Finland: Implementation of stakeholder and feedback surveys, project communication, information, coordination and reporting, project events such as organisation and marketing of workshops, and dissemination of information about project results.

6. What kind of data about me is processed?

The personal data required to maintain the project's stakeholder and customer relationships are the person's name, organisation and contact information (postal address, telephone number, e-mail address). Contact information is used for informing about the project, marketing workshops and events, as well as for stakeholder and feedback surveys. Personal data is collected only to the extent necessary for the implementation of the project.

The project does not process special categories of personal data (sensitive personal data).

The RDI work carried out in the project is related to the processing of large digital materials, the utilisation of artificial intelligence (AI) and the development of the activities of the participating organisations by applying these solutions. The project tests, among other things, the further education of the language models behind AI. In situations where project partners make material potentially containing personal data available to the project for development, its processing and protection will be agreed upon by a separate agreement between the parties, if necessary, specifying the terms of the processing of personal data.

7. From what sources is my data collected?

Personal data is collected directly from the data subjects themselves. Data is collected using forms (surveys, registration and participation forms for events and workshops) and by e-mail.

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

The personal data is not regularly disclosed to other parties. The data may be published to the extent agreed with the data subject. Certain information may be disclosed to the project funder when reporting matters required by the funder, e.g. lists of participants in the events.

9. Is my data processed outside the EU or the EEA?

Data will not be transferred by the controller outside the EU or the EEA.

Xamk uses Microsoft cloud services (Teams and OneDrive) as storage space. Generally, Microsoft processes data in the EU / EEA and in regional data centers. Microsoft is committed to complying with the general EU data protection regulation. The Microsoft Privacy Statement is available at: <https://privacy.microsoft.com/fi-FI/privacystatement>

10. How long will my data be kept?

Personal data will be retained for the duration of the project and as long as there is still a need for their use. In project activities, personal data will be stored according to the archiving period required by the funders. Project materials and data, which may also contain personal data, will be



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archived according to Xamk's practices: in EU-funded projects, the retention period requirement is 10 years after the end of the program period.

11. How is my personal data protected?

The personal data of people involved in the project is stored in information systems where users have personal user IDs. The data in the system can only be accessed and used by those persons of the registrar who have the right to do so on behalf of their work. The employees of the project are committed to confidentiality and to keeping confidential the information obtained in connection with the processing of personal data.

Customer and stakeholder data is stored in a customer management system, where the maintenance of the data is protected by an ID and a password. The data stored in the system is used by a group limited by user rights in the register.

The information security and confidentiality of the personal data have been ensured by appropriate technical and administrative measures in accordance with good data processing practice.

12. How can I exercise my rights under the Privacy Regulation?

Subjects / registrants can make all requests related to this project to the contact person below.

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