



Kaakkois-Suomen
ammattikorkeakoulu

KoKoLiike Project Privacy Notice

Compliance with the Data Protection Act 2018/1050 and the EU General Data Protection Regulation (GDPR) 2016/679.

This privacy notice provides the necessary information to individuals regarding the processing of personal data. It also serves to fulfill the data controller's accountability obligations, a key principle of the GDPR, which requires the data controller to demonstrate compliance with data protection laws.

Data Controller

South-Eastern Finland University of Applied Sciences Ltd (XAMK)
KoKoLiike – Solutions for Integrated Transportation in the Kotka Urban Area
P.O. Box 68, 50101 Mikkeli, Finland

Contact Person for Registry Matters

Aaro Tarvainen
Project Manager
South-Eastern Finland University of Applied Sciences (XAMK)
KoKoLiike – Solutions for Integrated Transportation in the Kotka Urban Area
Salakuljettajantie 4
48900 Kotka, Finland
Phone: +358 50 345 3211
Email: aaro.tarvainen@xamk.fi

1. Purpose of Processing Personal Data

Personal data is processed:

- As part of project activities and to implement the research, development, and innovation (RDI) activities of the university.
- To collect information for evaluating impacts and achieving project objectives.
- To promote comprehensive economic development.
- To explore opportunities, develop processes, and improve operational models, such as reducing the environmental impact of logistics, and enhancing business growth and profitability.
- For stakeholder collaboration, managing customer relationships, disseminating project outcomes, and conducting scientific research.

The collected data may also be used in the future to develop and promote economic activities with potential partners.

2. Legal Basis for Processing Personal Data

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

The processing of personal data for scientific research is based on the GDPR and national data protection laws.

Scientific research is considered a task carried out in the public interest, and the GDPR recognizes this as a legal basis for processing personal data (Recital 159). RDI activities are also included under the scope of scientific research.

3. Project Details

Name: KoKoLiike – Solutions for Integrated Transportation in the Kotka Urban Area

Focus: Development of sustainable and low-carbon mobility solutions

Duration: October 1, 2024 – September 30, 2026

Key Personnel:

- Project Manager: Aaro Tarvainen
- RDI Specialist: Rolf Jacksen
- Lecturer: Anssi Salmi

Other project personnel and students may also process personal data as part of the project activities.

4. Categories of Personal Data Processed

The following personal data may be processed:

- Name
- Address
- Phone number
- Email address

Additional details may include job title and workplace or organization. Data sets may also relate to logistics sector registries and information sources.

Primary contact information includes workplace-related details. If provided directly by individuals, home phone numbers and addresses may also be recorded.

5. Sources of Personal Data

Personal data is collected from public sources and directly from individuals. Information is gathered through participant surveys and materials. Data related to logistics may also be obtained from partners and authorities.

6. Disclosure of Personal Data to Third Parties

Data is generally not disclosed to third parties. Exceptions include:

- Development activities with XAMK's partners to promote economic activities in line with contractual agreements.
- Use of external data processors (e.g., IT service providers such as Microsoft) under contractual terms.
- Sharing required information, such as participant lists, with project funders during reporting.

Data may also be disclosed or published with the individual's consent.

7. Processing Data Outside the EU/EEA

Data is not transferred outside the EU/EEA by the data controller. XAMK utilizes Microsoft cloud services (Teams and OneDrive) for storage. Microsoft primarily processes data within the EU/EEA in regional data centers and complies with GDPR requirements. For more information, visit Microsoft's privacy statement: <https://privacy.microsoft.com/fi-FI/privacystatement>

8. Retention Period for Personal Data

Personal data is retained for the duration of the project and as long as necessary for its purposes. In funded projects, data is archived according to funder requirements. For EU-funded projects, retention periods extend to 10 years after the program period ends.

Individuals may withdraw consent for specific purposes, which will be recorded in the system.

9. Protection of Personal Data

Data is stored in information systems with access restricted to authorized personnel using individual credentials. Customer and stakeholder information is maintained in a CRM system secured with active directory credentials and passwords. Only a limited group of users can access the registry data. In case of data breaches, the data controller will notify authorities or affected individuals per applicable laws.

10. Rights of Data Subjects

Individuals have the following rights under the GDPR:

- The right to be informed about the processing of their personal data unless otherwise exempted by law.
- The right to access their data.
- The right to rectify inaccurate or incomplete data.



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- The right to restrict processing.
- The obligation to notify corrections or restrictions.
- The right not to be subject to automated decision-making without lawful grounds.

Requests related to these rights can be directed to:

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