

## Sustainable SMEs privacy notice

<b>1 Name of the register</b>	Sustainable SMEs
<b>2 Data Controller</b>	Jyväskylän Ammattikorkeakoulu Oy PL 207, 40101 Jyväskylä Y-tunnus 1006550-2
<b>3 Contact person in matters concerning the register, contact information during office hours</b>	Jamk's Data Protection Officer: Riikka Ahlgren, <a href="mailto:tietosuoja@jamk.fi">tietosuoja@jamk.fi</a> Project manager Marianne Lampi Tuumalantie 17, 43100 Saarijärvi, Finland, <a href="mailto:marianne.lampi@jamk.fi">marianne.lampi@jamk.fi</a> +358 50 400 3283
<b>4 Processing of personal data and its purpose</b>	<p>All personal data collected during the project will be treated confidentially as required by the national Data Protection Act (1050/2018) and the EU General Data Protection Regulation (2016/679). The data are not examined at the individual level.</p> <p>The purpose of the register and the personal data it contains is to support the project's measures and the achievement of its objectives. The purpose of the register is to collect information related to the implementation of the project, for example:</p> <ul style="list-style-type: none"> <li>• for the realization of project cooperation</li> <li>• communication with different target groups</li> <li>• to carry out interviews, surveys and studies</li> <li>• to carry out workshops</li> <li>• to carry out pilots</li> </ul> <p>The data will be collected from:</p> <ul style="list-style-type: none"> <li>• Project members</li> <li>• Small and medium-sized enterprises (SMEs) in defined target groups and location areas (northern periphery) in Finland, Sweden, Ireland and Iceland.</li> <li>• Stakeholder organizations of abovementioned SMEs</li> </ul>

	<ul style="list-style-type: none"> <li>• Business network organizations defined in the project scope</li> <li>• Project associated organizations</li> </ul> <p>The data is collected electronically or manually in Word templates, Webropol survey program, the digital platforms used in the project, email, phone, and participant lists.</p> <p>The project will be implemented between 1.4.2025 – 31.3.2028.</p>
<b>5 Data content of the register</b>	<p>The gathered information includes:</p> <ul style="list-style-type: none"> <li>• Company name, industry and contact information</li> <li>• Person's name, telephone number, email address</li> <li>• Lists of participants in project events (e.g. workshops and webinars): person's name, organization, email address</li> <li>• Contact information collected for the project's digital platforms</li> <li>• Other needed information related to project implementation, collaboration and communication</li> </ul>
<b>6 Grounds for processing</b>	<p>The legal basis for processing personal data under the EU's General Data Protection Regulation is the person's consent (Consent of the data subject).</p> <p>Sustainable SMEs project implementation, data and data collection and their management.</p> <p>Jamk's privacy policy based on EU General Data Protection Regulation (2016/679).</p>
<b>7 Regular sources of information</b>	<p>The information stored in the register is obtained from persons such as:</p> <ul style="list-style-type: none"> <li>• project surveys</li> <li>• user data of the digital platforms and tools used in the project</li> <li>• remote or face-to-face events related to project activities, and</li> </ul>

	<ul style="list-style-type: none"> <li>on other occasions or in connection with which the data subject discloses persons data.</li> </ul>
<b>8 Regular disclosure of data and transfer of data outside the EU or the European Economic Area</b>	<p>Data is not regularly disclosed to other parties. Information may only be published to the extent agreed with the data subject. Data is not transferred outside the EU and EEA.</p> <p>The data is processed by the controller mentioned above.</p> <p>Information required by the project funder may be disclosed to the project financier in connection with reporting, such as event participant lists.</p>
<b>9 Principles of register protection</b>	<p>The register is handled with care and the data processed with the help of information systems is protected appropriately. When register data is stored on Internet servers, the physical and digital security of their hardware is taken care of appropriately. The controller ensures that the stored data, server access rights and other information critical to the security of personal data are processed confidentially and only by the employees whose job description it belongs to. Manually collected data is stored in electronic form and stored on the server. The data will be stored after the end of the project in accordance with Jamk's information security guidelines.</p> <p>Outdated and unnecessary data will be disposed of in a reliable and appropriate manner.</p> <p>Personal data is stored for as long as it is necessary for the purposes of processing personal data defined in this privacy statement.</p> <p>Due to obligations under the Accounting Act or other prescriptive law, data may need to be stored longer than the above-mentioned period.</p> <p>The controller's servers are located in a locked and access-controlled data center.</p>

	Access to the servers is allowed only to administrators.
<b>10 Retention period of personal data or criteria for determining the retention period</b>	The controller stores participant data and other contact information in its own systems for the period required by NPA's funding terms.
<b>11 Profiling and automated decision-making</b>	The information in the customer register is not subject to profiling or automated decision-making.
<b>12 Rights of the data subject</b>	<p>The controller is obliged to notify the following rights of the data subject: According to the General Data Protection Regulation, the data subject has the right to</p> <ul style="list-style-type: none"> <li>• receive information about the processing of personal data</li> <li>• check the data concerning themselves and correct incorrect or missing data</li> <li>• delete their data</li> <li>• restrict the processing of their data</li> <li>• object to the processing of their data</li> <li>• request the transfer of personal data provided by the controller to another, if the basis for processing is consent or a contract</li> <li>• withdraw their consent</li> <li>• not be subject to automated decision-making</li> </ul> <p>The data subject may exercise one's rights by contacting the contact person or data protection officer mentioned in the notification.</p> <p>Further information on the rights of the data subject is provided by the contact person and/or the Data Protection Officer. A person has the right to lodge a complaint with the Office of the Data Protection Ombudsman if the data subject considers that the processing of his or her personal data has violated current data protection legislation. More information about the Data Protection Officer and the rights of the data subject and their implementation can be found <a href="#">in JAMK's</a></p>

	<a href="#">data protection statement</a> and on the <a href="#">Data Subject Rights</a> page.
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