

Privacy statement and information to the data subject (Articles 13 and 14 of General Data Protection Regulation (2016/679))

<b>1. Name of privacy statement</b>	<b>Innovation Through Gamification Solutions – InnoGS project (NPA0800202)</b>
<b>2. Controller</b>	<div>Name Savonia University of Applied Sciences Ltd.</div> <div>Address PL 6, 70201 Kuopio</div> <div>Other contact information (e.g. work telephone, email address) savonia@savonia.fi</div>
<b>3. Contact person in matters concerning the register</b>	<div>Name Kalle Sievänen, RDI-specialist <a href="mailto:kalle.sievanen@savonia.fi">kalle.sievanen@savonia.fi</a></div> <div>Telephone +358447856853</div>
<b>4. Data protection officer</b>	Administrative Coordinator Mervi Hätinén, tietosuojavastaava@savonia.fi
<b>5. Data subjects</b>	Stakeholders and target groups / end users (private individuals, parents of minors, and organisational contact persons) participating in activities organised by the InnoGS project.
<b>6. Legal basis for data processing</b>	The processing of personal data is based on the consent of the data subjects.
<b>7. Purpose of personal data processing</b>	<p>InnoGS is a project funded by Interreg NPA, promoting European territorial cooperation. The lead partner of the project is Savonia University of Applied Sciences, which is responsible for the implementation of the project and for the processing of personal data within it. Other project partners include Region Västerbotten (Sweden), Creative Crowd (Sweden), Ardán (Ireland), the University of Iceland, and the Ministry of Education of the Government of Greenland.</p> <p>The purpose of the register is to collect registrations for InnoGS project events, gather testimonials on the project's impacts, obtain parental consent for photographing and recording minors, and collect photos and recordings from project events:</p> <ul style="list-style-type: none"> <li>- The project partners and the funder will use the collected testimonials, photos, and recordings to promote the project results within the programme area and more broadly in the European context, as well as in various publications, on websites, and on social media.</li> <li>- Event registrations are used solely for managing registrations, determining participant numbers, and arranging possible catering and shared transport.</li> <li>- Parental consent is required for photographing events where minors are present.</li> </ul> <p>The project funder, Interreg NPA, requires the processing of personal data in the manner described in this statement. In addition to complying with the EU General Data Protection Regulation (GDPR), the project's international partners also follow their own national legislation and each prepare a separate privacy statement.</p>

<b>8. Personal data content and retention periods of the register</b>	<p>The register contains the following personal data:</p> <p>Event registrations: Name of the data subject, age, main activity, organisation name, job title, email address, phone number, dietary restrictions, the conditions accepted by the data subject regarding photographing and recording at the event, other additional information provided by the data subject, and information related to the event and its organisation.</p> <p>Testimonials: Name of the data subject, organisation name, job title, location, project name, the data subject's connection to the project, testimonial on the project's impacts, links shared by the data subject, photos shared by the data subject, date of the testimonial, and the data subject's permission to use the provided materials in different publications.</p> <p>Parental consent for photographing and recording minors: Parental consent for photographing and recording the minor, parent's name, minor's name, project name and the representing organisation's name, as well as the names and email addresses of its representatives, the names and email addresses of Interreg NPA representatives, the minor's signature, the parent's signature, and the date. If the child is at least 13 years old, parental consent is not required for processing the child's personal data when the legal basis for processing is the data subject's consent (Finnish Data Protection Act 1050/2018, Section 5).</p> <p>Photographs and recordings: Comprise photos and recordings taken at events in which data subjects appear. Those giving testimonials may appear in more recognisable photos and recordings. Event participants accept the conditions during the registration process. When providing a testimonial, the data subject authorises the use of photos taken of them, alongside their name and organisation details. In other cases, a separate signed consent is required.</p> <p>Retention periods: The retention periods of personal data in the register vary from 5 years to permanent storage. Personal data is retained by the InnoGS project partners only as long as necessary to fulfil the intended purpose, but Interreg NPA may also retain personal data for archiving purposes. Personal data, photos, and recordings published on the websites or social media channels of the InnoGS project, its partners, or Interreg NPA will be publicly accessible and retained as long as the respective websites or social media channels state in their privacy policies.</p>
<b>9. Regular sources of data</b>	<p>Personal data is obtained directly from the data subjects through forms and surveys.</p>
<b>10. Regular disclosure of data</b>	<p>Personal data will not be disclosed to parties outside the InnoGS project partners (Savonia University of Applied Sciences, Region Västerbotten, Creative Crowd, Ardán, University of Iceland, Ministry of Education of the Government of Greenland) and the funder Interreg NPA.</p>
<b>11. Transfer of data outside the EU or EEA</b>	<p>Data is not transferred outside the EU or EEA.</p>

<b>12. Principles for protection of the register</b>	<p>A Manual documentation</p> <p>No manual documentation is collected.</p> <p>B Computer-processed data</p> <p>Savonia University of Applied Sciences is committed to processing personal data in a confidential and secure manner. Only those persons who have the right to process the personal data in question for their work are entitled to use the system containing personal data. Each user has their own username and password for the system.</p> <p>Databases containing personal data are protected by firewalls, passwords and other technical means. The databases and their backups are located in locked rooms and only certain pre-designated persons can access the data.</p>
<b>13. Rights of data subject</b>	<p>For questions related to the rights of the registered person, you can contact the contact person of the register or the data protection officer.</p> <p>Under the EU's GDPR (2016/679) the data subject has the following rights:</p> <p><b>Right of access to their data</b> The data subject has the right to receive from the controller confirmation on whether or not the personal data concerning them is processed. The data subject has the right of access to the data. A fee may be charged for the right of control. The data subject's request for control may be refused if the requests are manifestly unfounded or unreasonable and especially if made repeatedly. (Articles 12 and 15)</p> <p><b>The right to rectification</b> The data subject has the right to demand rectification of inaccurate personal data concerning them. (Article 16)</p> <p><b>The right to erasure</b> With certain restrictions specified in the General Data Protection Regulation, the data subject has the right to have the controller erase the personal data concerning him or her. There is no right to deletion if we process your personal data to comply with a legal obligation or if the processing of your personal data takes place for the performance of a task in the public interest or for the exercise of public authority belonging to University of Applied Sciences. (Article 17)</p> <p><b>The right to restriction of processing</b> With certain exceptions specified in the General Data Protection Regulation the data subject has the right to request the controller to restrict the processing of personal data concerning him or her. (Article 18)</p> <p><b>The right to data portability</b> The data subject has the right to receive the personal data that he or she has provided to a controller in a machine-readable format when the processing is based on consent and is automated. (Article 20)</p> <p><b>The right to object</b> The registered person has the right to object, on grounds related to his personal special situation, to the processing of his personal data, which is based on the processing is necessary for the performance of a task in the public interest or for the exercise of public authority belonging to the controller. The controller may no longer process personal data, except if the controller can demonstrate that there is a significantly important and justified reason for the processing that overrides the interests, rights and freedoms of the data subject, or if it is necessary to prepare, present or defend a legal claim. (Article 21)</p>

	<p><b>The right to withdraw consent</b> If the processing of personal data is based on the consent given by the registered person, the registered person has the right to withdraw the consent given to the processing at any time without affecting the legality of the processing carried out on the basis of the consent before this. (Article 7)</p> <p><b>The right to appeal</b> The registered person has the right to file a complaint with the Office of the Data Protection Ombudsman, if one considers that valid data protection legislation has been violated in the processing of his personal data. <a href="https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman">https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman</a> (in english) <a href="https://tietosuoja.fi/ilmoitus-tietosuojavaltuutetulle">https://tietosuoja.fi/ilmoitus-tietosuojavaltuutetulle</a> (in finnish)</p>
<b>14. Automated decision-making</b>	The data subjects of the register are not subjected to automated decisions.