

Privacy Policy of Otto A. Malm Foundation's Application and Grant Register

1 Data Controller

Kommerserådet Otto A. Malms donationsfond sr (1108093-1)

Fredrikinkatu 40 E / Donner Kristian, 00100 Helsinki, Finland

2 Contact Person Responsible for Register

Secretary Kristian Donner

See [contact information](#)

3 Name of Register

Otto A. Malm Foundation's Application and Grant Register

4 Purpose and Legal Basis for Processing of Personal Data

The purpose of the Foundation is to support higher education, institutions or projects serving the common good, and scientific research, by distributing grants to individuals, work groups or organisations. All processing of personal data is carried out to promote this purpose. The Foundation may also process personal data for the purposes of reviewing and developing the Foundation's activities as well as complying with legal requirements.

The processing of personal data is usually based on the legitimate interest of the Foundation, but may also be based on consent, agreement or statutory obligation of the Foundation. Only personal data necessary for the purpose is processed, and the processing of personal data is justified based on the relationship between the Foundation and the applicant. Without the information detailed below, the Foundation cannot provide the applicant with access to the application system, receive or process applications, provide support, contact the applicant or distribute grants.

5 Content of Register

The register includes data provided in grant applications, such as the applicant's name, title or profession, contact details (address, telephone number and e-mail address), date of birth, application group, purpose for the applied grant, possible working group, members of possible working group, applied amount, submission date of application, grants previously awarded by the Foundation, qualifications and grades of the applicant, references, communication language and any other documents and information that the applicant has attached to his or her application.

The Register also contains information that is provided or needed for payment of awarded grants, such as bank connection, social security number, grant amount, payment date, payment receipt number and explanation. In addition, information on possible changes or cancellations of grants, information on official reporting, and information provided by the recipient regarding the use of the grant may be processed in the register.

6 Used Data Sources

The data contained in the register is mainly collected from the applicant him- or herself in connection with the grant application or a supplement thereto, as well as from the references designated by the applicant.

7 Cookies

A cookie is a small file that is sent from a website and stored on the user's device when visiting a website and which the user's browser then offers the website each time the user visits the site. The Foundation uses cookies to monitor traffic on the Foundation's website and in the grant-system operating in conjunction with the website. Cookies can be disabled or the browser can be set to alert to the use of cookies. Additional information on cookies is provided in the cookie notification on the Foundation's website.

8 Disclosure of Data and Data Transfers Outside EU / EEA

Personal data may be disclosed to the authorities in accordance with the legal obligations of the Foundation as well as to other entities that require personal data for the public interest. Data regarding paid grants will be given to the Tax Administration and the Farmers' Pension Institution (Mela). Personal data may be transferred to service providers and other sub-processors used by the Foundation. In connection with data transfers the Foundation takes reasonable legal, organizational and technical measures to protect personal data in an appropriate manner.

Personal data regarding grant holders and grants (applicant's name and title/profession, application group, amount of grant and purpose of the grant) are published on the Foundation's website and in the Foundation's annual report. Data regarding rejected applications are not published. The purpose of the publication is to maintain public trust in the Foundation's activities and to avoid duplicate grants for the same purposes.

As a main principle, the Foundation does not transfer personal data included in grant applications to countries outside the EU/EEA. However, service providers used by the Foundation for support services (e.g. for financial administration, website and e-mail) may transfer personal data to IT environments located outside the EU/EEA. In such cases the Foundation and its service providers will ensure appropriate protection of the transferred personal data in accordance with applicable data protection legislation.

9 Data Protection and Retention

The Foundation ensures that the processing of personal data is protected by appropriate technical and organizational measures. The measures shall ensure a level of safety appropriate to the level of risk involved in the processing. Consideration is given to confidentiality, availability and appropriate technical protection of the data.

Printed written material and other physical contents of the register are stored in locked spaces.

The connection to the web service is protected by SSL technology. Only designated administrators, members of the Foundation's Board of Directors, officials and experts have access to the personal data included in the service, and access requires a user name and password. The server devices are located in an access-controlled data centre with 24-hour monitoring, fire alarm system, automatic notification transfer, fire extinction system and uninterrupted backup power system.

The Foundation uses personal data as long as needed for a specific purpose, or as long as required by law. When personal data is no longer needed, it is either deleted or if necessary archived in the Foundation's archives. The archived material is, in principle, permanently stored.

10 Rights of Data Subjects

The data subject has the right to object at any time, on compelling legitimate grounds relating to his or her particular situation, to the processing of data relating to him or her. In case of such objection, the data subject shall specify the legitimate grounds for the objection.

The data subject has the right to access personal data stored in the register concerning him or her. In these matters, the data subject is asked to submit a detailed request to the contact person mentioned under Section 2. An inspection is free of charge if the request is made not more than once a year. However, the Foundation does not disclose data on evaluators of the applications or other experts used, nor does it provide statements in relation to individual grant applications.

The data subject has the right to demand that any inaccuracies in the data will be corrected or deleted, and he or she may also in other respects invoke his or her rights under applicable data protection legislation. The data subject has the right to request the deletion of data if he or she objects to the processing of data and there no longer is a legal basis for the processing of the data, or if the data is processed unlawfully. However, in some cases, the Foundation may be required by law to retain personal data e.g. to fulfil a statutory obligation.

The data subject has the right to file a complaint to the supervisory authority (the Finnish Data Protection Ombudsman) if he or she considers that personal data is being processed in a manner that is not in compliance with applicable data protection legislation.

11 Contact in Register Matters

All contacts and requests in relation to this Privacy Policy shall be made in writing to the contact person mentioned under Section 2.