



# Privacy statement: grant register

Familiarise yourself with the privacy statement pertaining to the Frame Foundation's grant register. Your personal data will be available to the Frame Foundation's representatives and internal grant evaluators, and your data may be transferred via an electronic user-connection and processed by experts outside the Frame Foundation within and outside the EU region when necessary.

The Frame Foundation is committed to managing personal data according to privacy laws and good data processing practices. Privacy laws here refer in particular to the EU's General Data Protection Regulation and national personal data legislation.

### Data controller

Name: Frame Foundation

Business ID: 2475893-2

Ratakatu 1 b A 9, 00120 Helsinki, Finland, Tel. +358 405070809

### Name of the register

The Frame Foundation Grant Register

### Register contact person

Grants Coordinator Jaakko Uoti

Ratakatu 1 b A 9, 00120 Helsinki, Finland, Tel. +358 50 308 7293, jaakko.uoti@frame-finland.fi

### The purpose, legal basis and data sources of personal data processing

Personal data is collected for processing grant applications and awarded grants, for evaluation, decisions, communications and for enabling and developing the monitoring of digital services. Data provided in the grant application and the information related to payments, research, progress or final reports of awarded grants are recorded into the register. The register is used to produce statistics for the evaluation and development of the operations of grant funding bodies.

The legal basis for the processing is the applicant's voluntary, ascertained, informed and unambiguous expression of consent with which they approve of the processing of their data.

The data is gathered from the applicants. For the sake of clarity, it must be noted that the applicants are registered data subjects according to privacy legislation. Saving and processing the data is based on the consent of the applicant. The registration of all the data subjects is based on the voluntary, ascertained, informed and unambiguous consent with which they approve the processing of their personal data.

For the sake of clarity, it must be noted that if the applicant withdraws their consent but not their grant application, the Frame Foundation has the legal basis, warranted by legitimate interests, to process personal data in order to fulfil its purpose.

### The register's data content

1. The applicant's data

The applicant's name, birthplace, personal identity number, address, phone number, email address, place of residence, degree, office or post, account number, tax district or municipality, nationality, language, sex and country of residence.

#### 2. Data concerning the project

The name of the project, the names of the participants, their place of residence, language and sex. The grant or item applied for, the purpose of the grant, the amount of the grant in euros, justification for the application, information pertaining to the travel grant, previous grants, other ongoing grant applications.

#### 3. Appendices and their data

Project plan, travel plan, the purpose of the project or the visit, date and programme, description of the exhibition or performance venue and its relevance to internationalisation, CV, biographies, pictures of the works, publication plan, distribution plan.

#### 4. Administrative information for grant applications.

Information concerning processing, decisions, payments, payment information, the applicant's activities in the grant portal, other technical information concerning the use of the portal such as log data about activities and internal communication between the data subject and data controller.

### Register users

Personal data is managed by the Foundation's Grant Coordinator, Director, Head of Administration and Finances, Head of Communications, evaluators selected by the Foundation, the Foundation's board, technical support, selected users from an accounting firm and accountants. Access is controlled by limiting it to read-only rights or to updating only those fields that are required by the user's tasks.

### The register's protective and safety measures

Accessing the register requires a private user ID. The main user determines the level of access users are granted. Logging into the system requires an individual password and the system operates via an SSL connection. The use and login activity of the register are monitored.

The data is gathered into the system's databases which are protected by firewalls and other technology. The databases are located in secured and guarded premises and the data is accessible only to selected individuals.

The Frame Foundation and the grant service provider have agreed to process the data according to regulations. The service provider states that the services of its subcontractors are included in the agreement.

The data managed by Frame is stored and protected so that outsiders will not be able to access the data and it cannot be destroyed, altered, released, transferred or accidentally or otherwise illegally processed. The applications are stored

according to the Frame Foundation's filing plan. Obsolete documents are destroyed using a shredder and/or by permanently removing them from the server.

The Frame Foundation is committed to following adequate safety measures in all its operations in order to secure personal data. For the sake of clarity, it must be noted that adequate safety measures refer not only to technical measures such as virus protection, firewalls and physical access controls, but also to organisational measures such as maintaining sufficient and specialised resources and the sufficient briefing of personnel. The Frame Foundation regularly evaluates the efficiency of the aforementioned measures in order to secure the safety of personal data. The Frame Foundation processes the personal data confidentially and ensures that its staff and/or subcontractors have signed a non-disclosure agreement and/or they are otherwise bound by a non-disclosure obligation.

#### Releasing data

When necessary, personal data may be transferred via an electronic user-connection and processed by experts outside the Frame Foundation within and outside the EU region who evaluate the grant proposals according to the guidelines and aims defined by Frame. The experts and others processing personal data conform to the confidentiality requirement decreed in § 33 of the Personal Data Act.

The grant committee signs a confidentiality agreement.

Information about grants paid to natural persons are delivered to the Farmers' Social Insurance Institution Mela and the Tax Administration.

The recipients, amounts, the place of residence of the recipients and the purpose of the awarded grants may be published on the Frame Foundation's website, in publications and in their annual report.

Confidential data recorded into the grant system are released only 1) with the permission of the applicant, 2) for archiving or statistical purposes based on the rights of the applicant or 3) the law.

#### Deleting applications and their personal data

##### 1. Awarded grants

The Foundation stores received applications and their personal data and any additions to them for communications, administration and statistical purposes for ten years or the necessary amount of time considering notices to the authorities and possible audits.

##### 2. Incomplete applications

The applicant can at any time delete the personal data entered into an incomplete application with the exception of the name and email address used in the registration process. The applicant may ask the register's contact person to remove this information if necessary.

### 3. Rejected applications

The Foundation removes the applications with their appendices, related personal data and any additions to it that have not been awarded a grant when there is no need for them to be stored for payment or statistical purposes.

### 4. The application's evaluation criteria

The Foundation removes the evaluation data of the applications three months after the date grant decisions are made.

### 5. Payment data

Payment data is stored for a necessary period of time taking into account notices to the authorities and possible audits.

### 6. Report data

Report data remains in long-time storage for statistical purposes, but it is rendered anonymous or pseudonymous so that the data cannot be connected to any specific person.

### 7. Messages

Messages related to the application are deleted when the application is deleted.

### 8. User IDs

User IDs are stored if the users send in applications later.

## Data subject rights

The registered data subjects are entitled to view stored information about themselves, they have the right to demand erroneous information to be changed and incomplete information completed or deleted if there are no legal grounds to store the information. The data subjects are also entitled to request restrictions to the processing of their information, to oppose the processing of information pertaining to them and the right to transfer information pertaining to them from one system to another.

The grant applicant and recipient may log into the grant system and access all the information they have provided for the register by opening the preview of the application form. The applicant does not retain the above rights to the evaluation or statistical data concerning the application.

The applicant has the right to cancel the application after which the application will not be evaluated. If a decision about the application has been reached, data concerning the application cannot be fully removed from the system. The applicant can download a digital PDF copy of the application form from the system for themselves.

The data controller may request the person making the request for proof of identity when necessary. The data controller will send a reply to the client within the time noted in the privacy law (usually within a month).

Requests for reviews and corrections must always be presented to the contact person responsible for issues related to the register.

It must be noted that if the processing is based on the data subject's consent, the data subject has the right to withdraw their consent at any time provided the withdrawal does not affect the legality of previous processing done on the basis of the previous consent.

#### Right to complaints

The applicant and grant recipient have the right to issue a complaint to the supervising authorities if they suspect their personal data has been processed erroneously.