



# Privacy statement: Open Call Application register

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

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

Töölönkatu 11 A, 00100 Helsinki, Finland, Tel. +358 405070809

Name of the register

The Frame Foundation Open Call Register

Register contact person

Director Juha Huuskonen

Töölönkatu 11 A, 00100 Helsinki, Finland, Tel. +358 44 728 9938,

juha.huuskonen@frame-finland.fi

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

The collected data is used for processing, evaluation, decisions and communications concerning the applications sent in by the participants of projects defined in the open call. The data provided by the applicants in their applications, progress reports and the final report are recorded into the register. The register is used to produce statistics for the evaluation and development of the Foundation's operations.

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 open call application, the Frame Foundation has the legal basis, warranted by legitimate interests, to process the personal data in order to fulfil its purpose.

The register's data content

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 native country for foreign applicants.

Appendices and their data

Justification for the application, a project or travel plan, the purpose of the project or visit, dates and programme, the purpose of the project in terms of internationalisation, a CV, biographies, pictures of the works, publication plan and distribution plan.

Administrative information for open call applications.

The applications' processing, decision, payment, payment information and communication between the data subject and the register administrator.

#### Register users

The personal data will be processed by the Foundation's Director, the Foundation's Head of Programme, selected evaluators appointed by the Foundation, the Foundation's Head of Administration and Finances, selected users of 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 encryption and safety measures

The data is collected into the applications@ email and saved into a Dropbox folder that is shared only with the aforementioned users of the system.

The data is stored and encrypted 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 with 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 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 according to the guidelines and aims defined by Frame.

#### Deleting applications and personal data

##### 1. Awarded grants

The Foundation deletes received applications and their personal data and any additions to them within a month of the date grant decisions are made, not including personal data necessary for administrative purposes which is stored only for the time it takes to consider notices to the authorities and possible audits.

##### 2. Incomplete applications

The Foundation deletes incomplete applications, their appendices, related personal data and any additions to them immediately when the applicant cancels their participation in the open call.

##### 3. Rejected applications

The Foundation deletes all the applications, appendices, personal data and any additions to them that have not been chosen for the project within a month of the date grant decisions are made.

#### 4. The application's evaluation criteria

The Foundation deletes the applications' evaluation information and its appendices within a month of the date grant decisions are made.

#### 5. Payment information

Payment information related to the applications is stored for a necessary period 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

Possible user IDs are stored until the grant recipients in the open call have been decided.

### Data subject rights

The registered data subjects are entitled to view stored information about themselves, they have the right to demand changes to erroneous information and incomplete information to be 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 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).

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.

However, the applicant does not retain the above rights for the application's evaluation data. Requests for reviews and corrections must always be presented to the contact person responsible for issues related to the register.

### 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.