

Privacy statement

Date prepared: 25 February 2025

1. Controller

Business Finland Oy, Business ID 2725690-3

2. Contacts regarding the register

dataprotection@businessfinland.fi

3. Name of the register

Discover Finland Project

4. Purpose, data content and basis of the processing of personal data

We value your interest in Discover Finland Project with its e-learning package and coaching that can be accessed through the Priima Learning Management System. This privacy policy explains the purposes for which your personal data is used throughout the Project and the rights you have with regard to your personal data.

Data subjects and Intended use	Data to be collected	Basis for processing
<p><u>Learners</u></p> <p>The initial collection of the personal data from the learner is realized through one-to-one meetings. Some of the information is checked or collected in order to verify the learner’s eligibility to the learning program, as required in the EU or national regulations governing funding of the Discover Finland Project.</p> <p>The collected information will then be used to register the learner to the Priima Platform, to create the personal account for the learner and provide the learner with the course access and coaching opportunity.</p> <p>Course engagement data and the learner’s feedback on the courses will be also captured to improve the course content and monitor the learning journey. In addition, the information that the learner provided will be used to communicate with the learner regarding the course updates, support, feedback requests, and also coaching meeting scheduling.</p>	<ul style="list-style-type: none"> - Name - Email address - Nationality - Country of residence - Gender - Age range - Industry interest - Information that the learner’s identity has been verified - User ID and password to the Platform - Data stored in the Platform on the learner’s performance - Learner’s feedback - Log data generated on the use of the Platform 	<p>The data that is needed to verify the learner’s eligibility to the learning program and for reporting purposes is processed in order to comply with legal obligation.</p> <p>The data is also processed for us to be able to deliver the learner with the learning and coaching service available in Discover Finland Project.</p> <p>We may also process the data based on our legitimate interest, for example in order to develop our services based on the received feedback or to monitor and ensure secure use of the Platform.</p>

<p>We will utilize the data also for creating statistics on the course engagement as required by the EU or national regulations governing funding of the Project. However, all statistics we provide to the Asylum, Migration and Integration Fund Managing Authority (Ministry of the Interior of Finland) are anonymous.</p>		
<p><u>Service providers, mentors, coaches and other company representatives</u></p> <p>We may use external service providers for creating course content to the Priima Platform. For that purpose, named representatives of the suppliers are provided user account with limited access rights to be able to do so.</p> <p>We may also provide user account with limited access rights to coaches, mentors and other company representatives who are facilitating the learning or coaching opportunities provided to the learners.</p>	<ul style="list-style-type: none"> - Name - Email address - Company represented - Industry - User ID and password to the Platform - Data stored in the Platform - Feedback - Log data generated on the use of the Platform 	<p>Processing of the data is needed to enable the representative to fulfil the agreed tasks.</p> <p>We may also process the data based on our legitimate interest, for example in order to develop our services based on the received feedback or to monitor and ensure secure use of the Platform.</p>

Priima Learning Management System is provided by Saarni Learning Oy. Processing tasks may also be outsourced to other service providers outside the controller in accordance with and within the limits set by data protection legislation.

5. Retention period of personal data

According to the EU and national regulations governing funding of the Project, the Project material shall be retained until December 31, 2032 to enable monitoring of funding. The data that is not needed for monitoring is retained until the end of the project, March 2027. Log data may be retained shorter period.

6. Regular data sources

Personal data is collected from the data subject themselves. Part of the data is generated in Priima Learning Management System.

7. Regular disclosures of data and categories of recipients

As a rule, personal data is not disclosed to third parties.

8. Transfer of data outside the EU or EEA

Personal data is not transferred outside the European Union or the European Economic Area. However, the learners may access the Platform from outside the EU or EEA.

9. Principles of register protection

Data processed electronically

Also the data that may be collected in the meetings is saved electronically. Data is saved in Business Finland's electronic filing systems or directly in Priima Learning Management Systems. Access to the register's data content is limited by role-based rights. Employees have an obligation of secrecy. In addition, employees are committed to complying with internal data security guidelines.

Data and backups stored in the information systems are located in locked and monitored facilities. The environment is protected by appropriate firewalls and other technical protections. The information systems are logged and the controller is informed of abnormal use of the system.

The purpose of the above measures is to ensure the confidentiality of the personal data stored in the register, the availability and integrity of the data, as well as implementation of the rights of the data subjects.

10. Automated decision making

Personal data will not be used for automated decision-making that would have legal or similar effects on the data subjects.

11. Rights of the data subject in relation to the processing of personal data

Right of the data subject to object to the processing of personal data

The data subject has the right, in relation to their particular situation, to object to profiling and other processing activities carried out by the controller on the personal data of the data subject to the extent that the basis for processing the data is the legitimate interest of the controller.

The data subject may submit a request for objection in accordance with Section 12 of this privacy statement. In connection with the request, the data subject must identify the specific situation on the basis of which they object to the processing. The controller may refuse to fulfil the request concerning the objection on the grounds provided by law.

Right of access of the data subject (right of inspection)

The data subject has the right to inspect what data concerning them is stored in the register. The request for inspection must be made in accordance with the instructions provided in this privacy statement. The right of inspection may be denied on the grounds provided by law. In general, the exercise of the right of inspection is free of charge.

Right of the data subject to rectification, erasure or restriction of processing

To the extent that the data subject can act on their own, they shall, without undue delay, upon having been informed of an error or upon becoming aware of an error themselves, rectify, delete or supplement the data in the register that is contrary to the purpose of the register, incorrect, unnecessary, incomplete or outdated.

To the extent that the data subject is not able to correct the data themselves, the request for correction shall be made in accordance with Section 12 of this privacy statement. The data subject also has the right to request the controller to restrict the processing of their personal data in a situation where the data subject is waiting for the controller's response to a request for rectification or erasure of their data, for example.

The right of the data subject to transfer data from one system to another

To the extent that the data subject has themselves provided the data to the register that is processed on the basis of the consent given by the data subject, the data subject has the right to obtain such data for themselves, generally in a machine-readable format, and the right to transfer this information to another controller.

Right of the data subject to lodge a complaint with the supervisory authority

The data subject has the right to lodge a complaint with the competent supervisory authority if the controller has not complied with the applicable data protection regulation.

Other rights

If personal data is processed on the basis of the consent of the data subject, the data subject has the right to withdraw their consent at any time.

12. Contacts

In questions related to the processing of personal data and in situations related to the exercise of personal rights, the data subject should contact the controller. The data subject may exercise their rights by contacting tietosuoja@businessfinland.fi

13. Updates

This privacy statement was last updated on 25 February 2025.
We monitor changes in data protection legislation and want to continuously develop our operations, and we therefore reserve the right to update this privacy statement.
