

Privacy Notice - Clients

1. Controller	Name: EduCluster Finland Ltd (ECF) Address: Lutakonaukio 7, 40100 Jyväskylä, Finland
2. Controller's authorized representative	Jyrki Saarivaara, CEO Email: jyrki.saarivaara@educluster.fi Tel: +358 40 1363900
3. Contact person	Suvi Geier, Director, Human Resources Lutakonaukio 7, 40100 Jyväskylä, Finland Other contact information: Tel. no: +358 40 765 5705 E-mail: suvi.geier@educluster.fi
4. Data Protection Officer	Suvi Geier, Contact information as above.
5. Purpose for processing personal data	<p>The data subjects are representatives of clients and potential clients of ECF.</p> <p>Personal data will be used for</p> <ul style="list-style-type: none"> - providing services clients have requested - maintaining business and client relationships of ECF - contacting potential clients who have provided their contact information to ECF or who ECF has identified as potential clients - re-activating expired client relationships <p>The information may be used for marketing purposes, unless a client or a potential client objects.</p> <p>Failure to provide data requested by ECF may mean that ECF is not being able to provide its services.</p>
6. Legal basis for processing the data	<p>GDPR Article 6 subparagraph 1b “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.”</p> <p>Before the client relationship has been established or has expired: GDPR Article 6 subparagraph 1f “legitimate interest pursued by the controller”. The legitimate interest is marketing of services and acquisition of customers. A separate balance test (available on request) has been completed to demonstrate the legitimacy and proportionality of the interest.</p>

<p>7. Description of the categories of data subjects and of the categories of personal data</p>	<p>Client information consists of the contact information of the representatives of ECF clients and potential clients:</p> <ul style="list-style-type: none"> • first name and surname, title, personal identification information • address • e-mail address, phone numbers • immigration and travel related documents if they are needed for providing ECF's services • any other additional information the clients have provided unsolicitedly or as requested by ECF <p>Access right to ECF's quality management systems require a separate user registration. In connection to the registration personal information and contact information is asked. User data of the quality management systems is stored separately from other client data.</p>
<p>8. Regular sources of information</p>	<p>Information is received from clients and potential clients. Information of potential clients might be sought from public sources.</p> <p>Information received from clients may also be complemented from public sources.</p>
<p>9. Categories of recipients to whom the personal data have been or will be disclosed</p>	<p>Information will be used by ECF employees who are involved in providing the services to a client or preparing provision of services.</p> <p>ECF may transfer the client information to its partners and subcontractors which need it for providing or preparing their services. The recipients typically include schools the clients visit, travel agencies, other companies or institutions acting as knowledge partners, hotels, external experts and owners of ECF.</p>
<p>10. Recipients in third countries or international organizations</p>	<p>Client information (except information concerning potential clients identified only by ECF) may be transferred to the countries where ECF has a subsidiary, branch or a representative office. At the time of drafting this privacy notice such countries include the UAE, Qatar and China. This kind of information transfer may be done <i>exceptionally</i> and only in case the personnel working in the aforementioned countries have essential knowledge in providing the services the <i>client has requested</i>.</p> <p>The transfer will be done using ECF's it-systems (as described in 12 below) or secure e-mail.</p> <p>The transfer of data is not possible based on the primary mechanisms defined in GDPR articles 45 (commission adequacy decision), 46 (appropriate safeguards) or 47 (binding corporate rules). The transfer is based on GDPR Art. 49 subparagraph 1b "the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-</p>

	contractual measures taken at the data subject's request” Data protection legislation in the UAE, Qatar and China differs from GDPR standards. ECF strives to afford the same level of data protection in Europe and outside Europe by using internal guidelines.
11. Time limits for erasure of data	Data will be reviewed when a client contract expires and every three years. Unnecessary data will be deleted. Data concerning potential clients will be removed as soon as it is evident that there will be no client relationship. Any personal data collected for ad-hoc purposes, such as travel documents needed for attending a training, will be deleted within 6 months after such purpose has been completed.
12. General description of the technical and organizational security measures	A Manual information Client information is stored in electronic format. If an extract of the data is produced on paper, the prints containing confidential information will be stored in lockable cabinets. B Electronically processed information Data stored in separate it systems from external service providers (ValueFrame; Microsoft cloud-based services): According to specifications of the service providers and data processing agreements in question. Access to these it-systems is protected by username and password. Data stored on network drives; server's database and content files are protected according to following practice: <ul style="list-style-type: none"> • the data is transferred using data encryption (SSL) • the data is backed up on daily basis • access to the data server is restricted to authorized personnel only • access to the data center [physical location of server(s)] is restricted to authorized personnel only
13. Rights of the data subject	The data subject has the following rights: <ol style="list-style-type: none"> 1. Right to be informed of data processing (Art 13 and 14) 2. Right of access (Art 15) <ul style="list-style-type: none"> - the data subject is entitled to access the personal information processed by the controller and certain information related to the processing 3. Right to rectification (Art 16) <ul style="list-style-type: none"> - the data subject has a right to request correction of inaccurate data and complement incomplete data concerning him or her. 4. Right to erasure (Art. 17) <ul style="list-style-type: none"> - the data subject has a right to request his/her data to be erased 5. Right to restriction of processing (Art 18) <ul style="list-style-type: none"> - the data subject is entitled to obtain from the controller restriction of processing where the conditions in Art 17 are

	<p>met</p> <ol style="list-style-type: none">6. Right to data portability, if the conditions in Art 20 are fulfilled7. The right to lodge a complaint with a supervisory authority (Art 77)<ul style="list-style-type: none">- every data subject shall have the right to lodge a complaint with a supervisory authority (The Office of the Data Protection Ombudsman in Finland)8. Right to object, if the processing is based on legitimate interest pursued by the controller
14. Automated individual decision-making	The client information will not be used for automated decision-making producing legal effects concerning the data subjects.