

Privacy Notice – Expert Pool

1. Controller	<p>Name: EduCluster Finland Ltd (ECF)</p> <p>Address: Lutakonaukio 7, 40100 Jyväskylä, Finland</p>
2. Controller's authorized representative	<p>Kati Loponen, CEO/COO E-mail: kati.loponen@educluster.fi Tel: +358 40 8254218</p>
3. Contact person	<p>Name: Suvi Geier Position: HR Director, Data protection officer</p> <p>Address: Lutakonaukio 7, 40100 Jyväskylä, Finland</p> <p>Other contact information: Tel. no: +358 40 765 5705; e-mail: privacy@educluster.fi</p>
4. Purpose for processing personal data	<p>Personal data will be used to find suitable candidates for positions arising in the course of ECF's business. The positions might be ECF internal positions or based on needs of ECF clients.</p> <p>In case ECF finds an interesting match between an expert's profile and an open position by ECF, its branches or clients, ECF will always contact the expert first.</p> <p>The experts will be asked what kind of positions they are interested when they are joining the Expert Pool. Failure to provide data may mean that expert's full competence is not recognised and suitable positions cannot be offered.</p>
5. Description of the personal data processed	<p>The personal data consists of experts'</p> <ul style="list-style-type: none"> • full name, title, personal identity code • home address • e-mail address, phone numbers • CV • education and other qualifications • work experience • any other additional information the experts have provided unsolicitedly or after request by ECF

6. Legal basis for processing the data	GDPR Article 6 subparagraph 1a “consent of the data subject.”
7. Sources of personal data	Personal data is gathered from the experts.
8. Categories of recipients to whom the personal data have been or will be disclosed	<p>Data subject’s data in Expert Pool will only be handled by ECF personnel, specifically named to be involved in the recruitment processes.</p> <p>Consent of the expert will be asked before his/her personal data is handed over to a client of ECF.</p>
9. Recipients in third countries	<p>Personal data may need to be transferred outside Europe</p> <p>A) to a country where the work position applied for and/or ECF’s client, is located. <i>Personal data will not be sent to the client without consent of the expert.</i></p> <p>1) Such transfer of data to ECF Clients outside EU (if there is no European Commission’s decision confirming adequacy of the data protection in client’s home country) is primarily based on GDPR Art 46 2(c) standard data protection clauses.</p> <p>2) If it is concluded that standard data protection clauses cannot be used, the transfer is based on either GDPR Art 49 subparagraph 1a “explicit consent” or exceptionally on GDPR Art. 49 subparagraph 1c “the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person”.</p> <p>OR</p> <p>B) to ECF’s a branch in Qatar if the position is in Qatar or ECF employees based in Qatar have essential knowledge needed for evaluating the expert’s competence.</p> <p>Data protection legislation in Qatar differs from GDPR standards. ECF strives to afford the same level of data protection in Qatar and in Finland by using internal guidelines. The transfer of data to Qatar 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 to ECF personnel in Qatar is based on GDPR Art. 49 subparagraph 1b “performance of a contract or the implementation of pre-contractual measures taken at the data subject’s request”.</p>

10. Time limits for erasure of data	Data will be retained for three years after it has been submitted. Experts may renew their consent after a three-year period has expired, or have their data removed anytime.
11. Rights of the data subject	<p>The data subject has the following rights:</p> <ol style="list-style-type: none"> 1. Right to be informed of data processing (Art 13) 2. Right of access (Art 15) <ul style="list-style-type: none"> - the data subject is entitled to access the personal data processed by the controller and other 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 18 are met 6. Right to data portability (Art 20) <ul style="list-style-type: none"> - the data subject shall have the right to receive personal data concerning him/her have the right to transmit those data to another controller 7. Right to withdraw consent (Art 7 subparagraph 3) <ul style="list-style-type: none"> - the data subject shall have the right to withdraw his or her consent at any time. Withdrawal does not affect lawfulness of processing based on consent before its withdrawal 8. 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; www.tietosuoja.fi) <p>The data subject may exercise rights 1-4 and 7 directly by accessing the system online. Other rights may be exercised by contacting the data protection officer.</p>
12. Automated individual decision-making	The personal data will not be used for automated decision-making producing legal effects concerning the data subjects.