

Privacy Notice – Staff

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>The data subjects are employees or external experts of ECF. References to “employees” include external experts as well in this privacy notice.</p> <p>Personal data will be used for upkeep of personnel contact information, pay salaries and fulfill other obligations of the employer based on the employment contract and legislation in force.</p> <p>Provision of personal data is a contractual requirement. Failure to provide the data to ECF prevents ECF from fulfilling its obligations.</p>
5. Description of the personal data processed	<p>The personal data consists of following:</p> <ul style="list-style-type: none"> • full name and personal identity code • home address • contact information • emergency contact information • passport and other travel related information • any other additional information the employees have provided or which ECF has requested and which is needed to ensure the rights and fulfillment of obligations of the parties <p>Special categories of personal data:</p>

	<ul style="list-style-type: none"> • data concerning health of the employee as provided by the employee • trade union membership (only stored and processed by the external salary accountant)
6. Legal basis for processing the data	<p>For the duration of the contract: GDPR Article 6 subparagraph 1b, “performance of a contract” After the contract is terminated: GDPR Article 6 subparagraph 1c “compliance with a legal obligation”</p> <p>Legal basis for processing data concerning health is GDPR Article 9.2b “Member State Law”, i.e. Act on the Protection of Privacy in Working Life, section 5.</p> <p>Legal basis for processing information concerning membership of a trade union is GDPR Article 9.2a “explicit consent”.</p>
7. Sources of personal data	<p>Personal data is received from employees or it can be produced by the employer.</p> <p>Data concerning health and trade union membership are always provided by the employees. Employees may choose to disclose the trade union membership directly to the external salary accountant, but this information is not stored by ECF.</p>
8. Recipients of personal data	<p>Personal data will be used by ECF employees whose duties involve HR management. Contact information and basic details related to employee’s expertise can be made available to clients or online.</p>
9. Recipients in third countries	<p>A) Employee personal data may sometimes be accessed from or transferred to Qatar where ECF has a branch to ensure that the employee can work for/at in Qatar and that the employee will receive all the benefits she/he is entitled to.</p> <p>Data protection legislation in Qatar differs from GDPR standards. ECF strives to afford the same level of data protection in Finland and in Qatar 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 Qatar is based on GDPR Article 49 subparagraph 1b “the transfer is necessary for the performance of a contract between the data subject and the controller”.</p> <p>B) Personal data of staff can be transferred to countries where the Client is located.</p> <p>1) Such transfer of data to ECF Clients outside EU (if there is no</p>

	<p>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>
10. Time limits for erasure of data	Data concerning duration of the employment and duties of the employee for ten years after termination of the employment due to the employer´s obligation to be able to provide a certificate of employment.
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, if the conditions in Art 20 are fulfilled 7. Right to withdraw consent, when processing is based on consent 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 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.