

15.5.2018

**Client Filing System****Record of processing activities****EU Regulation 679/2016 (General Data Protection Regulation) Articles 30 and 13**

1. Controller	Name: EduCluster Finland Ltd (ECF)
	Address: Lutakonaukio 7, 40100 Jyväskylä, Finland
2. Controller's authorized representative	Jyrki Saarivaara, CEO Email: <a href="mailto:jyrki.saarivaara@educluster.fi">jyrki.saarivaara@educluster.fi</a> 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: <a href="mailto:suvi.geier@educlusterfinland.fi">suvi.geier@educlusterfinland.fi</a>
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>Information in the filing system will be used for</p> <ul style="list-style-type: none"> <li>- providing services clients have requested</li> <li>- maintaining business and client relationships of ECF</li> <li>- contacting potential clients who have provided their contact information to ECF</li> <li>- re-activating expired client relationships</li> </ul> <p>The information may be used for marketing purposes.</p> <p>Failure to provide data may mean that ECF is not being able to provide the services as desired by the client.</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>After the client relationship has expired: GDPR Article 6 subparagraph 1f "legitimate interest pursued by the controller"</p>

7. Description of the categories of data subjects and of the categories of personal data	<p>The filing system contains the contact information of the representatives of ECF clients and potential clients:</p> <ul style="list-style-type: none"> <li>• first name and surname, title, personal identification information</li> <li>• address</li> <li>• e-mail address, phone numbers</li> <li>• immigration and travel related documents if they are needed for providing ECF's services</li> <li>• any other additional information the clients have provided unsolicitedly or as requested by ECF</li> </ul>
8. Regular sources of information	<p>Information in the filing system is received from clients and potential clients.</p> <p>Information in the filing system may also be complemented from public sources in case such information is necessary to conduct ECF's business.</p>
9. Categories of recipients to whom the personal data have been or will be disclosed	<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 information in this filing system to its partners and subcontractors which need it for providing the services requested by the client. 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>
10. Recipients in third countries or international organizations	<p>ECF is a company doing business globally. Information in this filing system may be transferred to:</p> <ul style="list-style-type: none"> <li>• to the countries where ECF has a subsidiary, branch or a representative office. At the time of drafting this record such countries include the UAE, Qatar and China. This kind of information transfer may be done in case the personnel working in the aforementioned countries have an essential role in providing the services.</li> </ul> <p>The transfer of data is not possible based on the mechanisms defined in the (GDPR) ensuring sufficient level of data protection, namely</p> <ol style="list-style-type: none"> <li>1) The Commission adequacy decision concerning level of data protection in a country outside EU (Art. 45 GDPR) OR</li> <li>2) Appropriate safeguards (Art 46 GDPR) OR</li> <li>3) Binding corporate rules approved by a competent supervisory authority (Art 47 GDPR)</li> </ol> <p>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-contractual measures taken at the data subject's request;"</p>

11. Time limits for erasure of data	<p>Data will be reviewed every three years. Unnecessary data will be deleted. For reference purposes ECF may store general non-personal data related information of the client.</p> <p>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.</p>
12. General description of the technical and organizational security measures	<p>A Manual filing system The filing system 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.</p> <p>B Electronically processed information</p> <p>Data stored in separate it systems (ValueFrame; Microsoft cloud-based services): According to specifications of the service providers in question. Access to these it-systems is protected by username and password.</p> <p>Data stored on network drives; server's database and content files are protected according to following practice:</p> <ul style="list-style-type: none"> <li>• the data is transferred using data encryption (SSL)</li> <li>• the data is backed up on daily basis</li> <li>• access to the data server is restricted to authorized personnel only</li> <li>• access to the data center [physical location of server(s)] is restricted to authorized personnel only</li> </ul>
13. Rights of the data subject	<p>The data subject has the following rights:</p> <ol style="list-style-type: none"> <li>1. Right of access (Art 15) <ul style="list-style-type: none"> <li>- the data subject is entitled to access the personal information processed by the controller and certain information related to the processing</li> </ul> </li> <li>2. Right to rectification (Art 16) <ul style="list-style-type: none"> <li>- the data subject has a right to request correction of inaccurate data and complement incomplete data concerning him or her.</li> </ul> </li> <li>3. Right to erasure (Art. 17) <ul style="list-style-type: none"> <li>- the data subject has a right to request his/her data to be erased</li> </ul> </li> <li>4. Right to restriction of processing (Art 18) <ul style="list-style-type: none"> <li>- the data subject is entitled to obtain from the controller restriction of processing where the conditions in Art 17 are met</li> </ul> </li> <li>5. The right to lodge a complaint with a supervisory authority (Art 77) <ul style="list-style-type: none"> <li>- every data subject shall have the right to lodge a complaint with a supervisory authority (The Office of the Data Protection Ombudsman)</li> </ul> </li> <li>6. Right to object, if the processing is based on legitimate interest pursued by the controller</li> </ol>

14. Automated individual decision-making	The information in the filing system will not be used for automated decision-making producing legal effects concerning the data subjects.
------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------