

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

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| 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 | Name: Director, Human Resources Suvi Geier |
| | Address: Lutakonaukio 7, 40100 Jyväskylä, Finland |
| | Other contact information: tel. no: +358 40 765 5705; e-mail: suvi.geier@educlusterfinland.fi |
| 4. Data Protection officer | Name: Suvi Geier Contact information as above |
| 5. Purpose for processing personal data | The data subjects are employees or external experts of ECF. References to "employees" are meant to include external experts as well in this record. Information in the filing system 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. |
| 6. Legal basis for processing the data | For the duration of the contract: GDPR Article 6 subparagraph 1 point b, "performance of a contract" After the contract is terminated: GDPR Article 6 subparagraph 1 point c "compliance with a legal obligation" Failure to provide the data to ECF prevents ECF from fulfilling its obligations. Legal basis for processing health information and information concerning membership of a trade union is GDPR Article 9.2a (consent) |
| 7. Description of the categories of data subjects and of the categories of personal data; | The filing system contains following information of the employees: <ul style="list-style-type: none"> • first name and surname, title, personal data • home address • e-mail address, phone numbers • emergency contact address • passport and other travel related information |

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| | <ul style="list-style-type: none"> 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 health information of the employee as provided by the employee trade union membership (only stored and processed by the external salary accountant) |
| 8. Regular sources of information | <p>Information is received from employees, except information which is produced by the employer.</p> <p>Health information and trade union membership information 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> |
| 9. Categories of recipients to whom the personal data have been or will be disclosed | <p>Information will be used by ECF employees whose duties involve HR management. Basic contact details such as phone number and e-mail address are visible to all employees and can be made available to clients as well.</p> |
| 10. Recipients in third countries or international organizations | <p>EduCluster is a company doing business globally. Information in this filing system may be transferred to</p> <ul style="list-style-type: none"> Basic contact information of the employees is available to other employees regardless of their location. Other information concerning employees may be transferred to the countries where ECF has a subsidiary, branch or a representative office to ensure that the employee can work for/at the foreign office and that the employee will receive all the benefits she/he is entitled to. Currently ECF has a branch in Qatar and in the United Arab Emirates and a representative office in China. <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"> The Commission adequacy decision concerning level of data protection in a country outside EU (Art. 45 GDPR) OR Appropriate safeguards (Art 46 GDPR) OR Binding corporate rules approved by a competent supervisory authority (Art 47 GDPR) <p>The transfer 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> |
| 11. Time limits for erasure of data | <p>Purely employment related data such as banking information will be deleted after employment is terminated.</p> <p>Basic 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.</p> |

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| <p>12. General description of the technical and organisational security measures</p> | <p>A Manual filing system The filing system is mostly stored in electronic format. Only sick leave related doctor's certificates are received in paper and stored in a safe.</p> <p>B Electronically processed information The server's database and content files are protected according to following practice:</p> <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 authorised personnel only <p>The use of the filing system is controlled by username and password.</p> |
| <p>13. Rights of the data subject</p> | <p>The data subject has the following rights:</p> <ol style="list-style-type: none"> 1. 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 2. 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. 3. 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 met 4. 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) |
| <p>14. Automated individual decision-making</p> | <p>The information in the filing system will not be used for automated decision-making producing legal effects concerning the data subjects.</p> |