

EduCluster Finland Ltd. Expert Pool

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: 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	Information in the filing system 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. Failure to provide data may mean that experts full competence is not recognized.
6. Legal basis for processing the data	GDPR Article 6 subparagraph 1a "consent of the data subject." The experts will be asked what kind of positions they are interested when they are joining the Expert Pool.
7. Description of the categories of data subjects and of the categories of personal data;	The filing system contains information of the experts, as provided by each expert: <ul style="list-style-type: none"> • first name and surname, title, personal identification information • home address • e-mail address, phone numbers • CV • education and other qualifications • work experience • any other additional information the applicants have provided unsolicitedly or after request by ECF

8. Regular sources of information	Information in the filing system is gathered from the Experts.
9. 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 data subject will be asked before information of the expert is handed over to a Client of ECF.</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 ECF's a branch in Qatar or in the United Arab Emirates and a representative office in China. Information transfer can be done in case experts are sought for ECF duties in those countries or if ECF personnel based in those countries have essential knowledge needed for evaluating the expert.</p> <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"> 1) The Commission adequacy decision concerning level of data protection in a country outside EU (Art. 45 GDPR) OR 2) Appropriate safeguards (Art 46 GDPR) OR 3) Binding corporate rules approved by a competent supervisory authority (Art 47 GDPR) <p>The transfer is based on GDPR Article 49 subparagraph 1a "the data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards."</p>
11. 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.
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 will be stored in lockable cabinets. No submissions are accepted in paper or via e-mail.</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 authorized personnel only

	<p>The use of the filing system by ECF staff, is restricted and controlled by username and password.</p> <p>The members of the Expert Pool access the system only by an individual link, sent automatically by the system.</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 erasure (Art. 17) <ul style="list-style-type: none"> - the data subject has a right to request his/her data to be erased 4. 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 5. 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 6. 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 7. 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>The data subject may exercise rights 1-3 and 6 by accessing the system online.</p>
<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>