## Luke

## **PRIVACY POLICY**

## Date 1 March 2021

1. Controller	Natural Resources Institute Finland (Luke)
	Postal address: Latokartanonkaari 9 FI-00790 Helsinki Tel. +358 29 532 5300
2a. The controller's responsible person	Jaana Sorvali, Seija Tuulentie and Ilona Mettiäinen
2b. Contact people in register- related matters and contact details of Luke's data protection officer	Contact person: kirjaamo@luke.fi  Data protection officer: tietosuoja@luke.fi
3. Name of register	International Arctic Adaptation Network  A network of people in Finland and other countries who are interested in climate adaptation in the Arctic, consisting of personal data in the Arctic Network for Climate Adaptation and Food Security (ACAF) project and its subprojects.
Purpose of the processing of personal data and legal grounds for processing	Personal data will be used for scientific research and development purposes at Luke. Under section 1 of the Government Decree on the Natural Resources Institute Finland (715/2014), Luke's task is to engage in scientific research and development, the transfer of data and technologies and the compilation of statistics regarding agriculture and the food industry, agricultural development, forestry, fish and game industries, reindeer husbandry, other business activities based on renewable natural resources, recreational use of nature and water and sea management.
	Data will be used in the ACAF project and its sub-projects to contact people interested in climate adaptation in the Arctic and to transfer data. Data may also be used to send electronic notifications, communicate information on events, results and services, and to identify projects and project parties related to climate adaptation in the Arctic. Furthermore, data may be used to send project-related surveys.
	The purpose of the International Arctic Adaptation Network is to bring people working with climate adaptation in the Arctic together in Finland and globally. The goal is to share knowledge and solutions, learn more about different parties, create new ideas and consider project ideas together. (Not necessary in the English text.)
	The processing of personal data is based on the consent given by data subjects as defined in article 6, section 1(a) a) of the EU General Data Protection Regulation (GDPR, 2016/679).

5a. Data content of the register	Personal data collected for the International Arctic Adaptation Network  - First name and last name - Email address - Name of the employer organisation - Native language or other language in which the data subject wants to receive content - Work address, telephone number and title - The work project's name, abbreviation, responsible organisation, financier, operating area, operating period, activities, results, project partners, URL
5b. Regular sources of data	Regular sources of data include data subjects, authorities, universities and research institutions.
6. Disclosure of data	The disclosure of data to other authorities and parties is based on the legislation. As public official data, public personal data can be disclosed for such purposes as historical and scientific research and the compilation of statistics on the basis of the Act on the Openness of Government Activities (621/1999). No personal data will be disclosed, unless there are legal grounds for the processing of personal data.  Data can be disclosed to the research project's financiers and partners, as well as for use in sub-projects.
7. Transfer of data outside the EU/EEA	No personal data will be transferred outside the EU or EEA.
8. Retention of personal data	Data collected for the register will only be retained as long as and to the extent as is necessary in relation to the original purposes, described in Section 4, for which the data was collected. Registered personal data must be erased when there no longer are legitimate grounds for processing.
9. Principles of register protection	Manual material will be retained in protected and monitored facilities. Servers and active devices are located in protected and monitored facilities. Data is processed in systems with some devices located in Luke's facilities and some in those of service providers.  Registered data is protected against unauthorised viewing, modifying and erasing. Protection is based on access control, personal user IDs and restricted access rights. Rights to view and modify data have been restricted in accordance with the tasks of each employee. Backup copies and physical security measures are used to ensure that no data is lost.  Any register-related data on paper is protected by means of access control and locked archives.

10. Rights of data subjects	Data subjects have rights towards their personal data that are based on the legal grounds of data processing. More information about the rights of data subjects and their fulfilment is available <a href="here">here</a> .  The rights of data subjects are based on articles 15–22 of the GDPR (2016/679).
11. Using data for automated decision-making, including profiling (GDPR articles 13.2(f) and 14.2(g))	No personal data will be used for automated decision-making, including profiling.
12. Changes to this privacy policy	We may change this privacy policy, for example, if there are changes in our operating methods or systems or in general data protection recommendations. We may also need to make changes as a result of legal amendments. Any changes enter into force after we have published our revised privacy policy.