Processing personal data included in the list of key stakeholders and the mailing list during CICAT2025

*Circular economy catalysts: Circular Economy Catalysts: From Innovation to Business Ecosystems (CICAT2025)* is a project that maintains and explores stakeholder relations and collaborations. The project plan for interacting with stakeholders is based on inclusive dialogue with stakeholders. CICAT2025 will investigate the interests, objectives and actions of multiple interest groups while focusing on local, regional and national stakeholders, such as companies, ministries, central organisations, development and support organisations as well as regional stakeholders, municipalities and cities. The results generated by the project will increase our understanding of the role of stakeholder collaboration in supporting and promoting Finland’s transition to a circular economy.

| Data controller | Turku University of Applied Sciences Ltd  
Address: Joukahaisenkatu 3  
FI-20520 Turku, Finland  
Switchboard +358 2 263 350  
kirjaamo@turkuamk.fi |
|-----------------|-----------------------------------------------------------------|
| Person responsible and contact persons | Person responsible:  
Anne Norström, Head of Education and Research (Turku University of Applied Sciences)  
Tel. +358 40 355 0365  
Contact person:  
Piia Nurmi, Research Group Leader, Head of Project Communications (Turku University of Applied Sciences)  
Tel. +358 40 355 0931 |
| Contact details of the data protection officer | Data protection officer (Turku University of Applied Sciences): please direct all inquiries concerning data protection to *tietosuoja@turkuamk.fi*.  
Emails sent to the above address will be processed by the data protection officer and the data protection expert, who serves as the data protection officer’s deputy. |
| Purpose of processing personal data | The participants of the CICAT2025 project have drawn up a list of the key stakeholders as well as a mailing list (=other stakeholders). Personal data will be processed in order to contact individuals for research purposes. The lists allow the project participants to:  
1) identify stakeholders  
2) share information among researchers  
3) implement the planned measures and communications |
The lists allow the communications team of CICAT2025 to keep track of the stakeholders who have already been contacted and who are yet to be reached. Research results will not be transferred to the data processor and will not be combined with respondents’ personal data.

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<tr>
<th>Lawful basis for processing personal data</th>
<th>EU’s General Data Protection Regulation (GDPR; Article 6, Paragraph 1e). Public interest.</th>
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<tr>
<td>Public interest</td>
<td>The data controller processes stakeholders’ contact and personal information in order to plan (who to contact) and conduct (who to interview) scientific research within the framework of the CICAT2025 project and to put the research results into practice (share information). Data will be processed by researchers participating in the project. CICAT2025 is funded by the Academy of Finland’s Strategic Research Council, meaning that the researchers are carrying out high-impact research that will deliver significant value for society. The project seeks to find concrete solutions to grand challenges that require multidisciplinary approaches. As stated in the guidelines provided by the sponsor, active collaboration between those who generate knowledge and those who utilise knowledge will be important throughout the project.</td>
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<td>Categories of personal data and the data retention period</td>
<td>We will collect the following data about private persons who are our stakeholders: • name, email address and phone number • the person’s home organisation and position within it • description of the home organisation The information will also include the researchers’ observations relating to stakeholders of the CICAT20205 project (such as why a particular stakeholder group is interesting, what is being done or will be done with them and what has been agreed with them.). The data will be retained throughout the CICAT2025 project. When the project is nearing its end, the participants will consider whether it will be necessary to extend the retention period, for example, to conduct a further project or projects later on. If the data retention period is extended, the data subjects whose personal data will be processed will be informed thereof. Data subjects may request for the erasure of their data by contacting Piia Nurmi, head of communications in the CICAT2025 project.</td>
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<tr>
<td>Sources of information</td>
<td>Information relating to stakeholders will be collected at events and meetings and based on notifications and materials prepared and provided by stakeholders.</td>
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| Recipients or recipient groups of personal data | Personal data will be processed through information systems that are technically maintained by: Microsoft  
Apsis  
Turku University of Applied Sciences has signed a contract with the above companies to serve as data processors.  
The personal data referred to herein may be provided to the researchers conducting the CICE2025 project who represent the following organisations:  
University of Jyväskylä  
Tampere University  
University of Eastern Finland  
University of Turku  
Tampere University of Applied Sciences  
Turku University of Applied Sciences |
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<td>Essential information about the transfer of data to third countries (outside of EU/EEA)</td>
<td>Data will not be transferred outside of the EU or the EEA.</td>
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</table>
| Data protection principles | Personal data will be managed by Piia Nurmi, head of communications of CICAT2025. The information included in the list will be processed by the CICAT2025 research consortium. Access to the data is restricted to persons who need to process said data in connection with the performance of their duties and functions. Only authorised persons have the right to access the data.  
The servers maintained by Turku University of Applied Sciences are located in secure and supervised facilities. |
| Rights of data subjects | As set out in the GDPR, data subjects have the right:  
• to access the data held about them by the data controller unless otherwise expressly provided by law  
• to review the personal data held about them by the data controller and have any inaccurate or incomplete data revised  
• to have their data erased (not applicable if the lawful basis for processing personal data is legal obligation or public interest)  
• to restrict the processing of their personal data  
• to object to the processing of their personal data if the lawful basis for processing personal data is public interest or legitimate interest  
• to request the transfer of personal data, which they have submitted to the data controller, to another data controller if the lawful basis for processing personal data is consent or contract  
• to withdraw their consent for processing their personal data |
• to be notified of the rectification or erasure of their data or the restriction of processing their data
• In addition, data subjects shall have the right not to be subject to a decision based solely on automated processing (data subjects may give separate consent for automated decision-making)

Personal data will not be used for profiling purposes.
We describe the processing activities undertaken during the CICAT2025 project as clearly and transparently as possible in this privacy policy and will strive to further develop this policy. We will notify data subjects of any changes that affect their rights under this policy as prescribed by law.
Data subjects may exercise their rights by contacting the contact person or data protection officer identified above. For more information about data subjects' rights, please get in touch with the contact person and/or data protection officer.
If the purposes for which the data controller processes personal data do not require the identification of a data subject by the controller (or if the personal data to be processed does not allow for the identification of a data subject by the controller), the right to be informed, the right of access, the right to rectification, the right to erasure, the right to restrict processing and the right to data portability shall not apply.
Data subjects have the right to file a complaint with the Office of the Data Protection Ombudsman if they consider the processing of their personal data to violate the provisions of the GDPR. The data protection officer’s contact details are provided at the beginning of this privacy policy. All subject access requests will be processed on a case-by-case basis.