

Privacy Policy for the World Circular Economy Forum (WCEF)

1. Controller

Controller of the register:

Sitra, the Finnish Innovation Fund (business ID 0202132-3)

Contact person in matters concerning the register:

Kirsi Pönni

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Contacting the Data protection Officer: kirjaamo@sitra.fi

2. Name of the register

The World Circular Economy Forum's interest group and marketing register.

3. Purpose of personal data processing

Sitra shall process personal data for the purposes laid down as its tasks and objectives in the Act on Sitra, the Finnish Innovation Fund (717/1990) insofar as the data relate to managing, marketing, administering and developing interest group and collaboration relationships.

Sitra shall process personal data for the **arrangements concerning The World Circular Economy Forum (WCEF) related events, workshops and meetings** that fall within its organisational responsibility and are targeted at interest groups and collaboration partners.

Sitra shall also process personal data in connection with **other communications related to WCEF** targeted at **interest groups and collaboration partners**, such as surveys, informing and reporting (e.g., newsletters), communicating about various competitions and calls for ideas, as well as providing information on them and marketing them to the target audience, and for purposes connected to **direct marketing and digital direct marketing**. For the aforementioned purposes, personal data shall also be processed concerning the **planning, realisation and development of communication, informing and marketing**.

The data subject shall have the right to prohibit direct marketing targeted at him or her.

4. Legal basis for personal data processing

Sitra processes personal data referred to in the privacy policy section 5. subsections (a)-(c), (e) and (i) to perform its tasks carried out in the **legitimate interest**. **Consent** is applied to information provided by persons themselves, which are detailed in section 5. subsections (d) and (f) – (h). Consent is also applied in case the data subject's personal data (e.g., name, job title, organisation, nationality, biography) is published on the WCEF event related channels such as mobile application, website or at the venue.

Sitra is actively shaping the future by studying, examining and selecting partners from various sectors to participate in open-minded trials and reforms. As part of its operation, Sitra organises events and publishes reports and other publications. For Sitra to be able to accomplish the task that has been prescribed to it by law, it is important to communicate information about these to the correct interest groups.

Sitra therefore targets communication about its activities at those who belong to its interest groups or to the interest groups of its projects. Message recipients may decline the messages targeted at them and the communication does not in any way threaten the fundamental rights or freedoms of the data subject. Participation in the events is voluntary, but participants' personal data is required in the preparation of the events for reasons such as security.

The information about data subjects' work or positions may contain information that can, through details such as party membership or participation in organisations (e.g., political views or religion), reveal data belonging to special categories of personal data. In this respect, Sitra only processes data that the data subject has expressly made public.

5. Data content of the register (processed personal data categories)

The register contains the following personal data about persons belonging to an interest group. The data in section (a) are collected on all data subjects and the data in sections (b) to (j) are collected when necessary.

- (a) The person's (data subject's) basic data, such as name, form of address and contact information, job title and organisation (telephone number, email address and /or street address).
- (b) Publicly available data on the person's (data subject's) work and position, such as title, education, place of work (organisation), photo and job title.
- (c) The language used by the person (data subject).
- (d) Direct marketing permissions and prohibitions expressed by the person (data subject).
- (e) Data related to communication between the data subject and Sitra, such as subscriptions to newsletters and other lists, registration for and participation in events and meetings, as well as any correspondence that may be necessary for maintaining the interest group relationship.

In addition to the aforementioned personal data, the register may contain the following personal data on the persons (data subjects) who participate in the WCEF event.

- (f) Dietary restrictions the participant (data subject) may have and other possible matters that must be taken into account in the preparation of an event.
- (g) A photograph(s) and / or video(s) of the participant (data subject).
- (h) Data related to participant's (data subject) age and nationality, country of residence.
- (i) other WCEF event related personal data the person gives to Sitra, such as the person's biography, form of transportation or attendance in prior WCEF events.

In addition to the above-mentioned personal data, the register may contain the following personal data on persons (data subjects) who use Sitra's information systems that require identification.

(j) Transactions in electronic information systems for a restricted period of time (opened page / file, time stamp, user ID and IP address).

6. Regular data sources

Personal data shall be collected from **public sources**, such as organisation websites, **from the data subject** and **in connection with events** organised by Sitra. In addition, with the person's consent, personal data can be retrieved from Sitra's other information systems and registers insofar as the personal data are owned by Sitra.

Data are also created **as part of Sitra's activities** when a person participates in events and meetings and when communication is targeted at this person.

7. Personal data retention period

The collected data shall be retained only for the duration and to the extent necessary for the original or compatible purposes for which the data was compiled.

In addition, the data listed below shall be retained as per the following retention periods.

(a) The basic data on the data subjects contained by the register shall be retained as long as is necessary for developing and maintaining collaboration partner and interest group relationships. The need to retain the data shall be assessed at regular intervals.

(b) Participants' (data subjects') personal data related to the organisation of the WCEF event or other similar occasion organised by Sitra for its collaboration partners and / or interest groups shall be retained as long as Sitra organises the annual WCEF events. However, the data related to the dietary restrictions shall be retained for the duration of the relevant event. The data on participants of events organised by Sitra are archived.

(c) Personal data collected by Sitra for the purposes of direct marketing shall be retained as long as is necessary to finish the related measures.

Sitra shall regularly assess the need to retain the data as per the internal Code of Conduct. Furthermore, Sitra shall perform all possible and required measures to ensure that such personal data that are inaccurate, erroneous or outdated for the purposes of processing are deleted or corrected without delay.

8. Recipients of personal data (recipient categories) and the regular disclosure of data

Upon participant's (data subject's) consent, the personal data referred to in the privacy policy section 5. subsection (a) may be disclosed to the partners of the WCEF events. The partners are identified on a case-by-case basis in connection with the invitations and / or registration.

Please note that some of our partner organisations are located outside the EU or the EEA. When disclosing the above-mentioned personal data based on your consent, adequate level of data protection may not be guaranteed.

9. Transferring data outside of the EU or the EEA

The data contained in the register may be transferred outside of the EU or the EEA. When transferring personal data, Sitra observes the model contract clauses approved by the European Commission concerning the transfer of personal data to third countries, implements other appropriate protection measures as necessary, ensures that the adequate level of data protection is guaranteed in the third country and/or otherwise ensures compliance with the GDPR when transferring personal data e.g., by transferring personal data based on article 49 paragraph 1 subparagraph (c).

10. Register protection principles

Any physical data material containing personal data shall be retained in a locked facility that can only be accessed by appointed persons whose duties require access authority.

The databases containing personal data are on servers which are kept in locked facilities that can only be accessed by appointed persons whose duties require access authority. The servers are protected by an appropriate firewall and technical protection.

The databases and systems can only be accessed with separately granted personal user IDs and passwords. Sitra has restricted the access rights and the authorisations to access the data systems and other mediums in such a way that the data can only be accessed and processed by persons who are needed with regard to lawful processing. In addition, the database and system transactions are registered in the logs of Sitra's IT systems.

Sitra's employees and other personnel have undertaken to comply with the obligation of secrecy and to keep confidential the information they receive in connection with the personal data processing.

Processing sensitive personal data shall only be permitted and technically enabled by means of user administration to a selected and limited group of persons, who need to process such data on Sitra's behalf because of their work duties, for example in connection with travel arrangements.

11. Rights of the data subject

The data subject shall have the following rights laid down in the EU's General Data Protection Regulation.

- (a) The right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
 - (i) the purposes of the processing
 - (ii) the categories of personal data concerned
 - (iii) the recipients or recipient groups to whom personal data have been disclosed or will be disclosed
 - (iv) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period

(v) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing

(vi) the right to lodge a complaint with a supervisory authority

(vii) where the personal data are not collected from the data subject, any available information as to their source

(viii) the existence of automatic decision-making and relevant information about the logic related to such processing, as well as the relevance of this processing and its possible consequences for the data subject.

(b) The right to cancel consent at any time without this affecting the lawfulness of the processing performed on the basis of the consent.

(c) The right to demand that the controller rectify without undue delay any inaccurate and erroneous personal data on the data subject and the right to have incomplete personal data completed.

(d) The right to obtain from the controller the erasure of the personal data concerning the data subject without undue delay in situations determined in the EU's General Data Protection Regulation.

(e) The right to obtain from the controller restriction of processing in situations determined in the EU's General Data Protection Regulation.

(f) The right to receive the personal data concerning him or her, which the data subject has provided to Sitra, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, if the processing is based on the consent referred to in the Regulation and the processing is carried out automatically.

(g) The right to file a complaint with the supervisory authority if the data subject considers that the processing of the personal data concerning him or her violates the EU's General Data Protection Regulation.

Requests concerning the realisation of the data subject's rights shall be addressed to Sitra's contact person mentioned in Section 1.

12. Making changes to the privacy policy

We reserve the right to alter this privacy policy by notifying of any changes on our website. The changes may be based on changes in legislation and other similar reasons. We recommend that you read the content of the privacy policy regularly.