

Ella and Georg Ehrnrooth Foundation (hereinafter the 'Foundation') privacy policy
Date of completion 14 November 2018

1. Controller

Ella and Georg Ehrnrooth Foundation
Business Identity Code 0276047-6
Postal address: c/o Nordea Private Banking
Aleksanterinkatu 36 B, FI-00020 NORDEA

2. Person in charge of the register

Chairperson of the Board of Trustees

3. Name of the register Grant applicant register and grant holder register

4. Purpose of processing personal data and legal basis

Grant applicant register: The register of grant applications addressed to the Foundation is for grant decision-making, statistics and historical information on the Foundation. Details provided in grant applications and information related to the progress of research projects and their final reports are filed in the register.

Grant holder register: The grant holder register is for paying awarded grants and monitoring of the payments as well as for the grant payment notifications to the Tax Authority and the Farmers' Social Insurance Institution Mela.

The Foundation's grant applicants and grant recipients are regarded as the Foundation's customers whose personal data the Foundation is entitled to process based on a legitimate interest.

5. Processing of grants

The Foundation's grant applicant and grant holder registers are kept for as long as their purpose has been fulfilled. Personal data are only processed to the extent required by grant applications and awarding of grants.

Grant applicants need a personal password to log in to the application online service. The grant application data are saved and processed based on the consent of the applicant concerned. Applicants must check from their referee in advance whether data on their personal data as a referee may be recorded in the system.

The groups receiving personal data to which information may be disclosed are the following: the Foundation's Board of Trustees, the functionary, the persons separately appointed by Nordea Bank Abp and the Foundation's pre-appointed persons, such as the evaluators of grant applications. The user right to the system requires a personal password.

6. Protection of the registers

The data are collected in the databases of the electronic data system of Datalink Oy which are protected with firewalls or by other technical means. The databases are located on locked-up premises to which access is controlled. Only certain pre-authorised persons have access to the data.

Printed written register material, if such exists for practical reasons, is kept on locked-up premises to which access is technically controlled.

7. Data content of the registers

Grant applicant register: Name, date of birth and contact details of the grant applicant, purpose or type of the grant applied for, amount and period of application of the grant applied for, estimated duration of the grant project, action plan, the applicant's report on any grants obtained during the past three years, appendices to the application, such as the applicant's curriculum vitae and corporations' annual reports, project budgets and the insider questions with answers as required by the Finnish Foundations Act (487/2015).

Grant holder register: In addition to the data listed above, the applicant's personal identity number, a corporation's Business Identity Code, bank account number, awarding date and amount of the grant, and purpose and payment details of the grant.

8. Data custody periods of the grant applicant and grant holder registers

The data on applicants who have not been awarded a grant will be kept until the end of the year following the year of application, after which the data will be removed from the register. The details of grant recipients may be kept for ten years, including the year the grant was awarded. The name of the grant recipient and the amount and purpose of the grant will be stored perpetually.

9. Grounds for grant decisions to grant applicants

The Foundation does not disclose the comments of the evaluators of grant applications or the persons delivering opinions of the applications to the applicants, nor does the Foundation justify its decisions, as the evaluators and commentators have the right to give their honest opinions of the applications evaluated, which are only made known to the parties deciding on the awarding of grants.

10. Regular disclosure of data

The awarded grants may be published on the Foundation's website. The Tax Authority and the Farmers' Social Insurance Institution Mela are informed of the grants paid to natural persons to meet the liability of insuring the grant recipients. In addition to the Foundation's Board of Trustees and functionary and the personnel of Nordea Bank Abp the external preappointed expert evaluators of grant applications process grant applications. Furthermore, the referees named by applicants, persons providing technical support,

accounting firms and auditors process personal data. The data are only disclosed to the extent necessary for the group of recipients concerned.

11. Data subjects' right to access their personal data

Grant applicants and grant recipients have the right to gain access to their personal data saved in the Foundation's register. The request for access and any questions may be addressed to the Foundation's e-mail address.

12. Right to rectification and the process of rectifying personal data

Grant applicants and grant recipients are entitled to have inaccurate personal data corrected in the Foundation's register. The request for rectification must be made in writing and duly specified to the address:

Ella and Georg Ehrnrooth Foundation, c/o Nordea Private Banking, Aleksanterinkatu 36 B, FI-00020 NORDEA.

The Foundation/controller shall inform the data subject within one month of the receipt of the request of the measures taken based on the request. This deadline may be extended as necessary by two months at maximum, given the complexity and number of the requests.

13. Consent to the use of personal data

By logging in to this grant application register, I herewith consent to the processing of my personal data as presented in sections 1–12 above.