

## Privacy statement

Date prepared: 25 October 2024

### 1. Controllers

Business Finland Oy, Business ID 2725690-3

and

Innovation Funding Agency Business Finland, Business ID 0512696-4

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### 2. Contacts regarding the register

[tietosuoja@businessfinland.fi](mailto:tietosuoja@businessfinland.fi)

### 3. Name of the register

Personal register related to the use of Business Finland's digital services

### 4. Purpose, data content and basis of the processing of personal data

The data content of the register encompasses personal data that is processed in connection with the registration, authentication and access management of Business Finland's digital services. As a main rule, the registration, authentication and access management of persons using Business Finland's digital services is handled through the BF-ID service. Consents related to marketing communications are also collected in BF-ID service. In addition, individuals can manage their own data as well as consents related to marketing communications in the BF-ID service. The data content of the register also encompasses marketing-related consents and preferences given and selected by individuals in Business Finland's other digital services, as well as the log data collected in the digital services provided by Business Finland.

| Intended use   | Data to be collected  | Basis for processing  |
|--|---|---|
| <p><i>Registration</i> – During the registration process, the person creates a username and password for logging in to the digital services provided by Business Finland after the registration process.</p> <p>The information collected during registration is also used for customer service.</p> | <p>Data collected from the person: First and last name ("given name"), email address ("username"), password, phone number, organisation</p> <p>Data received from the Suomi.fi authentication service: Time stamp, first and last name ("official"), authentication method, personal identity code ("HETU" or a foreign user ID (UID))</p> <p>Log data: Time stamp, first and last name, email address, personal identity code ("HETU" or a foreign user ID (UID)), phone number, authentication method, user's BF ID, IP, transaction IDs, fault codes</p> | <p>Public interest<br/>Legitimate interest</p> <p>If a person chooses to use the Suomi.fi authentication service during the registration phase, they are considered to have given their consent to the processing of their personal identity code for the purpose referred to in this section.</p> <p>The legal basis for processing log data in the services of the Innovation Funding Agency is compliance with a legal obligation.</p> |

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|---|--|--|
| <p><i>Authentication</i> – Identity verification is used for online authentication when a person logs in to a digital service provided by Business Finland. Business Finland uses the data to identify the user.</p> <p>Depending on the digital service, either weak identification or the Suomi.fi authentication service for authentication is used.</p> | <p>Data collected from the person (weak identification):<br/>Organisation, username, password</p> <p>Data received from the Suomi.fi authentication service:<br/>Time stamp, authentication method, personal identity code ("HETU" or a foreign user ID (UID))</p> <p>Log data:<br/>Time stamp, first and last name, email address, personal identity code ("HETU" or a foreign user ID (UID)), authentication method, user's BF ID, IP, transaction ID, fault codes</p> | <p>Legitimate interest of the customer company and the controller</p> <p>The legal basis for processing personal data required for authentication in the services of the Innovation Funding Agency is compliance with a legal obligation.</p> <p>The processing of personal identity codes in digital services other than funding services is based on Section 29 (5) of the Data Protection Act (<i>establishment of identity</i>).</p> |
| <p><i>Access management</i> – When using the digital services provided by Business Finland, it is checked whether the person signing in has the authority to use the service independently or on behalf of a company.</p>   | <p>Data received from the Suomi.fi authentication service:<br/>Role in the company, authority to act on behalf of the company</p> <p>Log data:<br/>Time stamp, first and last name, email address, personal identity code ("HETU" or a foreign user ID (UID)), authentication method, user's BF ID, organisation data, access right roles, IP, transaction IDs, fault codes</p>  | <p>Legitimate interest of the customer company and the controller</p> <p>The legal basis for processing personal data required for access management in the services of the Innovation Funding Agency is compliance with a legal obligation.</p> <p>The processing of personal identity codes in digital services other than funding services is based on Section 29 (1) of the Data Protection Act (<i>unique identification</i>).</p>  |
| <p><i>Managing one's own data</i> – A person can manage their own data entered during registration.</p>   | <p>Data/changes to be collected from a person:<br/>First and last name ("call name"), email address, password, phone number, organisation?</p>   | <p>Legitimate interest<br/>Public interest</p>   |
| <p><i>Marketing consents</i> – Consents to marketing communications are collected from the person during registration. The person will then manage their consents in the BF-ID service.</p>   | <p>Personal marketing communications choices</p>   | <p>Consent</p>   |
| <p><i>Users' preferences</i> – A person's choices regarding the content of the digital services provided by Business Finland.</p>   | <p>Personal preferences:<br/>Countries, industries, communication settings, method of receiving communications (SMS, e-mail), etc.</p>   | <p>Consent</p>   |
| <p><i>Log data</i> – Business Finland collects log data on the use of digital services.</p>   | <p>Business Finland's services provide the following log data: maintenance log, access control log, usage log, error log and change log</p>  | <p>Legitimate interest</p> <p>The legal basis for processing log data in the services of the Innovation Funding Agency is compliance with a legal obligations.</p>   |

Processing tasks may also be outsourced to other service providers outside the controller in accordance with and within the limits set by data protection legislation.

## **5. Retention period of personal data**

The personal data in the BF-ID service (except log data) are deleted after 24 months of inactivity. In addition, the personal data will be deleted upon request, insofar as the person has the right to delete the data pursuant to Article 17 of the GDPR. Log data that has been retained for more than five years is automatically deleted.

## **6. Regular data sources**

Personal data is collected from the data subject themselves. In addition, the Suomi.fi authentication service maintained by the Digital and Population Data Services Agency and used by Business Finland discloses personal data to the BF-ID service.

## **7. Regular disclosures of data and categories of recipients**

As a rule, personal data is not disclosed to third parties.

## **8. Transfer of data outside the EU or EEA**

Personal data may be transferred outside the European Union or the European Economic Area in accordance with and within the limits set by data protection legislation. If there is no decision on an adequate level of data protection for the destination country, the transfer of data may take place with appropriate safeguards, such as standard clauses approved by the European Commission. In some individual cases, personal data may be transferred without the aforementioned safeguards if the transfer takes place as described in data protection legislation in order to protect the interests of the person or in order to enter into a contract or fulfil contractual obligations.

## **9. Principles of register protection**

### Data processed electronically

Access to the register's data content is limited by role-based rights. Employees have an obligation of secrecy. In addition, employees are committed to complying with internal data security guidelines.

Data and backups stored in the information systems are located in locked and monitored facilities. The environment is protected by appropriate firewalls and other technical protections. The BF-ID system is logged and the controller is informed of abnormal use of the system.

The purpose of the above measures is to ensure the confidentiality of the personal data stored in the register, the availability and integrity of the data, as well as the realisation of the rights of the data subjects.

## **10. Automated decision making**

Personal data will not be used for automated decision-making that would have legal or similar effects on the data subjects.

## **11. Rights of the data subject in relation to the processing of personal data**

### Right of the data subject to object to the processing of personal data

The data subject has the right, in relation to their particular situation, to object to profiling and other processing activities carried out by the controller on the personal data of the data subject to the extent that the basis for processing the data is the legitimate interest of the controller.

The data subject may submit a request for objection in accordance with Section 1 of this privacy statement. In connection with the request, the data subject must identify the specific situation on the basis of which they object to the processing. The controller may refuse to fulfil the request concerning the objection on the grounds provided by law.

### **Right of access of the data subject (right of inspection)**

The data subject has the right to inspect what data concerning them is stored in the register. The request for inspection must be made in accordance with the instructions provided in this privacy statement. The right of inspection may be denied on the grounds provided by law. In general, the exercise of the right of inspection is free of charge.

### **Right of the data subject to rectification, erasure or restriction of processing**

To the extent that the data subject can act on their own, they shall, without undue delay, upon having been informed of an error or upon becoming aware of an error themselves, rectify, delete or supplement the data in the register that is contrary to the purpose of the register, incorrect, unnecessary, incomplete or outdated.

To the extent that the data subject is not able to correct the data themselves, the request for correction shall be made in accordance with Section 12 of this privacy statement. The data subject also has the right to request the controller to restrict the processing of their personal data in a situation where the data subject is waiting for the controller's response to a request for rectification or erasure of their data, for example.

### **The right of the data subject to transfer data from one system to another**

To the extent that the data subject has themselves provided the data to the register that is processed on the basis of the consent given by the data subject, the data subject has the right to obtain such data for themselves, generally in a machine-readable format, and the right to transfer this information to another controller.

### **Right of the data subject to lodge a complaint with the supervisory authority**

The data subject has the right to lodge a complaint with the competent supervisory authority if the controller has not complied with the applicable data protection regulation.

### **Other rights**

If personal data is processed on the basis of the consent of the data subject, the data subject has the right to withdraw their consent. The data subject may withdraw their consent in the BF-ID service at any time.

## **12. Contacts**

In questions related to the processing of personal data and in situations related to the exercise of personal rights, the data subject should contact the controller. The data subject may exercise their rights by contacting [tietosuoja@businessfinland.fi](mailto:tietosuoja@businessfinland.fi)

## **13. Updates**

This privacy statement was last updated on 25 October 2024.

We monitor changes in data protection legislation and want to continuously develop our operations, and we therefore reserve the right to update this privacy statement.

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