



## RDI PROJECT PRIVACY STATEMENT

### Please, enter project title and number:

European Social Innovation Campus (ESIC), 22E86

### Privacy Statement date of compilation:

12.3.2023 (updates related to analytics/Matomo)

### Project title and duration:

European Social Innovation Campus (ESIC), 48 months (ending in the end of August 2027).

### Project description:

Joining the Pact for Skills on Proximity and Social Economy, the European Social Innovation Campus (ESIC) contributes to the challenge of the upskilling and reskilling of 5% of the workforce and entrepreneurs of the sector each year to tackle the green and digital transitions in the social economy by boosting social innovation capacities. The Alliance brings together higher education and vocational education and training, social economy organisations and enterprises from several European countries and European level actors.

### Project partners:

Diaconia University of Applied Sciences, University of Tallinn, Odisee University of Applied Sciences, University of South-Eastern Norway, EURICSE, AMUSAL, AdV Romania Foundation, Live Vocational College, Autonomous Province of Trento, Bucovina Institute Association, Federazione Trentinadella Cooperazione, FECOMA, Rethink Irelands, Ukrainian Social Academy, Euclid Network.

### Register controller and contact information:

Diaconia University of Applied Sciences Ltd,  
P.O. Box 12, 00511 Helsinki

<https://www.diak.fi/en/diak/contact-us/>

Data protection officer email: [tietosuojavastaava@diak.fi](mailto:tietosuojavastaava@diak.fi)

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### **What is the purpose of processing personal data?**

The website and the upcoming e-learning platform gather user data from the visitors and individuals signing up for the courses this project creates. The data is re-utilised for research purposes ("the dynamic Skills Monitor integrated into the platform will host skills intelligence data in an open format accessible to all stakeholders and researchers") in the consortium partner countries and the EU.

On a smaller scale, we also might talk on the e-learning platform with those who signed up and contact them based on their previous interest to generate more specific research data and advertise more content that might interest them. Based on the data collected, we can also create more meaningful study content during the project when we start learning what the participant is interested in based on their activity on the platform.

### **What is the basis for processing the data?**

- ☒ Participant consent
- ☐ Complying with legal obligations
- ☒ The processing is necessary for scientific or historical research purposes or statistical purposes, and it is proportionate to the aim of public interest pursued
- ☐ Legitimate interest, please, specify:

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**Whose personal data does the register contain?**

Citizens from the consortium partner countries and European citizens visit the website or sign up for the e-learning platform. The course content is there for teachers from vocational education up until the HEI and PhD level, as well as the entrepreneurs of social enterprises and C-level people of any business.

**Where was the data collected?**

☒ Participation is voluntary.

**Personal data is collected from the following sources:**

- ☒ Directly from research participants
- ☒ Individual interview, not saved
  - ☐ Questionnaire, paper version
  - ☒ Questionnaire, electronic version
  - ☒ Video recording or other recording

☐ Other recording, please, specify:

☐ From other sources than participants, please, specify, specify the data as well:

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### **What personal data does the register contain?**

Personal data from the website visitors is the data Matomo collects (on the website's WordPress platform). Similar data is gathered when visitors sign up for any course content in the e-learning platform (Howspace) linked to the website and voluntarily share their background information about themselves. As the course content is there for teachers from vocational education up until the HEI and PhD level, as well as the entrepreneurs of social enterprises and C-level people of any business, during the sign-up, we will have specific questions indicating the reasons to sign up and, for example, study background information. Platform data indicates user interest in the courses or other content in the e-learning platform and, for example, age group or country information. The data described above includes elements the user decides to share with us, such as name (/username), year of birth (selecting from the year groups), country location, educational information: level of education, professional information: field of business and level of expertise, personal interest in joining (+ listing the courses/content of interest, something we will also follow up as data on the platform).

The platform provider's sign-up alternatives contain the following options: Google, Microsoft, or Apple sign-up/login information. Based on this, we can also gather some user demographic information.

Data will be unidentified, and anonymity will be considered when the data collected is grinned for research use. As the data is contained in the project funded by the European Commission, we will also follow these regulations provided by the EU.

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**Does the project process sensitive personal data (EU GDPR compliant special categories of personal data)?**

☒ The research does not process special categories of personal data

**The research processes the following special categories of personal data:**

- ☐ Race or ethnic origin
- ☐ Political opinions
- ☐ Religious or philosophical conviction
- ☐ Membership of a trade union
- ☐ Genetic data
- ☐ Biometric data
- ☐ Health data
- ☐ Sexual behaviour or orientation
- ☐ Criminal record or related data

**Grounds for processing special categories of personal data:**

- ☐ Participant's explicit consent
- ☐ Scientific or historical research purposes or statistical purpose
- ☐ Participant has made sensitive data to be processed publicly available
- ☐ Processing is necessary for public interest
- ☐ Other, please, specify:

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**How long is personal data stored in the register?**

Document storage durations are defined in the Diak filing plan and they are mainly based on legislation, funder requirements, general university of applied sciences practices or Diaconia University of Applied Sciences administrative needs.

The personal data in the register and related to it will be stored for 10–15 years depending on the requirements of the funder.

After the storage period ends, the data on paper will be destroyed in storage bins for confidential documents and electronic data will be erased from the systems.

**How is data protected?****Paper material:**

- ☒ Paper material is not collected
- ☐ Paper material is collected, the material is protected as follows:

**Electronic materials:**

- ☐ Multi-factor authentication (MFA)
- ☒ User ID
- ☒ Password
- ☐ Limiting user rights
- ☐ Other, please, specify:

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**Anonymising research data / pseudonymisation:**

- ☒ Research data will be anonymised  
(all personal data will be erased in full so that it is impossible to return to identification and new information cannot be added to the data)
- ☐ Research data will be pseudonymised  
(identification can be recovered with a code or similar key and new data can be added)
- ☐ The research data will be anonymised or pseudonymised in part
- ☐ The research data will not be anonymised or pseudonymised

**If the research data is anonymised/pseudonymised in part or it will not be anonymised/pseudonymised at all, please, state here why this is so:**

**How are special categories of personal data protected:****How is personal data processed after the project has ended (before destroying it):**

- ☐ The personal data in the project register will be destroyed.
- ☐ The personal data in the research register will be stored as pseudonymised.
- ☒ The personal data in the research register will be stored as anonymised.
- ☐ Personal data (name, email, organisation) can be used after the project for communicating about Diak projects.

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**Where and how will the materials be stored:**

Materials (data) will be stored on the e-learning platform behind the user ID and password, to be seen only by the project personnel (as well as the project EC coordinators). The anonymised data is shared openly for research purposes based on the open sciences as it is a legal obligation under the Horizon Europe-funded project.

**Will the data be disclosed to external parties?**

- ☐ The data will not be transferred nor disclosed outside the project.
- ☒ The data will be transferred or disclosed outside the project, where and to whom:

The anonymised data is shared openly for research purposes based on the open sciences as it is a legal obligation under the Horizon Europe-funded project.

**Is the data subject to automatic decision-making?**

The data in the register and its other data will not be used for automatic decision-making or profiling.

**Will data be transferred outside of the EU/EEA?**

- ☐ The data will not be transferred nor disclosed outside EU/EEA countries.
- ☒ The data will be transferred or disclosed outside EU/EEA countries, where and to whom:

As Ukraine is one of the Consortium partners, approved by the European Commission, the data is shared also outside of the EU/EEA by this. The anonymised data is shared openly for research purposes based on the open sciences as it is a legal obligation under the Horizon Europe-funded project.

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The personal data in the register is mainly not transferred outside EU/EEA countries or international associations. Due to the international nature of the operation, Diak may, however, use resources, applications and servers in providing their services that are from outside EU/EEA countries. In these situations, Diak ensures that the need for data transfer is based on legislation and that the personal data are protected according to European Commission approved standard contractual clauses and appropriate technical and organisational protective measures. In addition, in this type of data transfer, a Transfer Impact Assessment (TIA) is completed when necessary and the general level of data protection of known data transfer target countries is monitored. In all cases, the data transfer is implemented according to the General Data Protection Regulation and only in the extent that is absolutely necessary.

### What rights do I have?

As a registered person, you have the right to obtain data on how and for what purpose your data is used. You may request a copy of all personal data that concern you and the correction of any potentially wrong information.

You may also request the removal of your data or limit its processing. In all cases, the data will not, however, be removed or limited if, for example, the personal data is processed for compliance with a legal obligation, the performance of a task carried out in the public interest or in the exercise of official authority vested in Diak.

In certain situations, you may also transfer the personal data you have delivered us to another controller or oppose the processing of your data, in other words, request that we refrain from processing it completely. In addition, you may request that we do not make a decision regarding you, that is based on automatic personal data processing alone.

If you would like to know more about how your data is processed or use your rights, you are welcome to contact Diak Data Protection Officer ([tietosuojavastaava@diak.fi](mailto:tietosuojavastaava@diak.fi)).

In addition, you always have the right to leave a complaint to the control authority. To do this, you should contact the Data protection ombudsman, who is an official and supervises the processing of personal data in Finland.

### CONTACT DETAILS:

Office of the Data Protection Ombudsman, P.O. Box 800, 00531 Helsinki

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

Tel. +358 29 566 6700

<https://tietosuoja.fi/en/home>

General advice for private persons: Tel. +358 29 566 6777