

PRIVACY NOTICE

14.9.2026

1. Controller	Natural Resources Institute Finland Postal address: Natural Resources Institute Finland (Luke) P.O. Box 2, 00791 Helsinki, Finland Tel. +358 29 532 6000
2a. Controller's responsible person	Pasi Rikkonen, firstname.surname@luke.fi
2b. Contact person in the matter and contact details of the data protection officer	Contact person: kirjaamo@luke.fi Data protection officer: tietosuoja@luke.fi
3. Name of register	SECUREFOOD project personal data
4. Purposes and the legal grounds for processing	Personal data is used in Luke's scientific research- and development activities. Based on section 1 of the Government Decree on the Natural Resources Institute of Finland (Luonnonvarakeskuksesta annettu valtioneuvoston asetus (715/2014)) Luke carries out scientific research- and development activities, transferring of technology and information, and statistic production in the field of food- and agriculture economy, rural development, forestry, the fishing- and game husbandry, reindeer husbandry, other industries based on renewable natural resources, the recreational use of nature and the management of water resources and marine environments. The data will be processed as part of case studies on resilience in the dairy sector conducted in Finland and Greece within the SECUREFOOD research project (https://secure-food.eu/), which is funded by the Horizon Europe programme. Luke is responsible for the technical implementation of the surveys and for analysing and comparing the survey results. The Greek survey is promoted and disseminated through stakeholder networks by ELGO-DIMITRA. The case studies include surveys, interviews and workshops involving stakeholders, experts and public authorities in the dairy sector. The aim is to assess the ability of the Finnish and Greek dairy systems to withstand disruptions, recover from crises and renew themselves in a changing operating environment. The data will be used to identify and contact people interested in the SECUREFOOD project, disseminate project information and collect research data. Luke may use the data to communicate the results of the research to respondents who have given their consent, to send electronic newsletters (e.g. regarding events, results and services), to identify

	projects and stakeholders related to the theme, and to conduct surveys and interviews related to the project. The processing of personal data is based on conducting scientific research carried out in the public interest in accordance with Article 6(1)(e) of the EU General Data Protection Regulation (2016/679) and Section 4(1)(3) of the Data Protection Act (1050/2018).
5a. Type of personal data in the register	The following personal data might be collected about you in the research: - First name and surname - Email address* - Survey and interview responses** - Audio recording - Video recording - Interview or workshop notes - Photographs *Respondents' contact details are collected for the purposes of conducting the survey and will not be linked to other responses. In addition, an email address may be requested from participants who are willing to receive further information on the project's results. **The survey comprises the following sections: Background information, Resilience of the dairy sector, Recovery capacity of the dairy sector, Regenerative capacity of the dairy sector, Open-ended questions
5b. Regular sources of data	Data is mainly collected from the data subjects themselves at project events and through other forms of contact. Other regular sources of data include public authorities, the ELY Centre, universities and research institutes, the websites of agricultural colleges, and the project register for projects funded under the Rural Development Programme. Data is also collected from public sources. The contact details of key public sector actors and businesses are collected from public sources and from public authorities.
6. Regular disclosure of data	Data can be disclosed only within the scope obligated and permitted by the legislation. As public government information, public personal data can, based on the Act on the Openness of Government Activities (621/1999), be disclosed for e.g. historic and academic research and the compilation of statistics. Personal data is not disclosed unless there is a lawful ground of processing. Data may be disclosed to the research project's funder, in accordance with the funder's conditions, for the purpose of carrying out the research, and to a follow-up project to enable the project mapping to continue. Anonymised survey data collected in Greece may be shared with ELGO-DIMITRA for research, comparative analysis and dissemination purposes. Once anonymised, the data does not contain information that can be used to identify individual participants.

7. Transfer of data outside the EU/EEA	Data is transferred outside the EU/EEA area. Personal data is processed in Microsoft's 365 services. As a rule, M365 services are implemented within the EU, but data may also be processed outside the EU in exceptional cases, for example to provide support services. The basis for the transfer is the European Commission's adequacy decision of 10.7.2023 on the adequacy of data protection in the United States and the standard contractual clauses approved by the Commission.
8. Storage period	Data collected for a register is only stored as long as and to the extent as is necessary in relation to the original purposes, described in Section 4, for which the data was collected. Registered personal data must be erased when there no longer are legitimate grounds for processing. The direct identification data will be deleted as a precaution when the data is created. The data is anonymized, i.e. all personal data will be irreversibly erased when the data is created / when the research has ended.
9. Protection principles of register	Data is processed in systems with some devices located in Luke's facilities and some in service providers'. Registered data is protected against unauthorised viewing, modifying and erasing. Protection is based on access control, personal user IDs and restricted access rights. Rights to view and modify data have been restricted in accordance with the tasks of each employee. Backup copies and physical security measures are used to ensure that no data is lost. Any register-related data on paper is protected by means of access control and locked archives.
10. The data subject's rights	Data subjects have rights towards their personal data that are based on the legitimate grounds of data processing. More information about the rights of data subjects and their fulfilment is available here. The rights of data subjects are based on articles 15–22 of the EU GDPR (2016/679).
11. Using data for automated decision-making, including profiling (articles 13.2(f) and 14.2(g) of the GDPR)	No personal data is used for automated decision-making, including profiling.
12. Changes to this privacy notice	We may change this privacy policy, for example, if there are changes in our operating methods or systems or in general data protection recommendations. We may also need to make changes as a result of legal amendments. Any changes enter into force after we have published our revised privacy policy.