

PRIVACY NOTICE

8.9.2025

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	Linda Rosengren
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	Personal data of the Learn2Transform project
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. Personal data is used in Luke's research project "Equipping researchers to drive transformation (Learn2Transform)" where the data is used to examine how researchers understand their roles in advancing sustainability transformation. The project organises a series of interactive workshops that brings together researchers from Luke's four research programs. In addition, a survey will be carried out to support the workshop findings. Information will be used to produce scientific articles and relevant communication outputs (e.g. blog post, practice brief). Personal data can also be used for the notification of project results. 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 is being collected about you in the research: - First- and surname - E-mail - Name of work organization - Native language or other language that has been chosen for receiving content - Work address, telephone number and title - Audio/ video recording - Workshop notes - Survey responses
5b. Regular sources of data	Regular sources of data are examinees themselves and the project workshops in which the participants are invited to take part.
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. The data can be disclosed to the financier (Luke) of the research project according to the requirements of the financier.
7. Transfer of data outside the EU/EEA	Personal 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 data is anonymized, i.e. all personal data will be irreversibly erased when the research has ended.
9. Protection principles of register	Manual material is stored in protected and monitored facilities. Servers and active devices are located in protected and monitored facilities. 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. Information about any changes can be seen in the revision history. The correctness of data is verified by means of mechanical and manual controls at different stages of data processing. 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.¹ 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.

¹ <https://www.luke.fi/en/about-luke/privacy-policy/rights-of-data-subject>