PRIVACY POLICY

1. Project details	HybridS
	Centria University of Applied Sciences Ltd Talonpojankatu 2, 67100 Kokkola, Finland Tel +358 6 868 0200
2. Contact persons in matters relating to the project	Egidija Rainosalo egidija.rainosalo@centria.fi +358 44 725 0264
3. Data protection officer	Centria University of Applied Sciences Ltd Data rotection officer Talonpojankatu 2, 67100 Kokkola, Finland Tel. +358 6 868 0200 email: tietosuojavastaava@centria.fi
4. Purpose and legal basis for processing personal data	In the co-funded project HybridS, personal data of employees of the project implementing organizations and partner organizations are collected and processed for the purposes of cooperation, communication, information dissemination, and reporting. The legal basis for the processing of personal data is the legitimate interest of Centria and the project partners (Article 6(1)(f) GDPR). The collection and processing of personal data are necessary for the implementation of the project carried out by Centria University of Applied Sciences Ltd. Within the project, training sessions and events are organized for parties interested in the project theme. Personal data of individuals who register for these training sessions and events are collected and processed for the purposes of communication and marketing related to the specific event. The legal basis for this processing is the legitimate interest of Centria and the project partners (Article 6(1)(f) GDPR). In addition, the contact details of individuals who register for training sessions are processed for the marketing of other events and training sessions organized within the same project. In such cases, the legal basis for the processing of personal data is the consent of the data subject (Article 6(1)(a) GDPR), which is given at the time of registration for the event or training. If catering is provided in connection with the training sessions or events described above, information on possible allergies is also collected from participants in order to take these into account in the catering arrangements and to protect the health of the individuals concerned. With regard to allergy information, the legal basis for processing is the explicit consent of the data subject (Article 9(2)(a) GDPR).
5. Legitimate interest of the controller	The legitimate interest consists of implementing the project and fulfilling the obligations related to funders and the use of public funding. Where a project involves multiple implementing organizations, an agreement on project implementation is concluded between all implementing parties. Implementing the project in accordance with the agreement and the funding conditions would not

	be possible without the collection and processing of personal data and the necessary communication between implementing organizations and partner organizations. With regard to the processing of personal data of individuals who register for training sessions and events organized within the framework of the project, the legitimate interest is based on the fact that the data subject has voluntarily registered for the training or event. In such cases, the legitimate interest relates to the service provided by the project implementers and the necessary communication associated with that service. The personal data collected are limited in quantity and consist of non-sensitive name and contact details. Data subjects are either employed by, or in a comparable relationship with, one of the project implementing organizations, or have actively registered for activities organized within the framework of the project. Processing activities for these purposes are limited strictly to the communication necessary for project implementation and for the organization of project-related events and training sessions. In situations where personal data are used for the marketing of other training sessions or events, consent is requested at the time of registration. The foreseeable risks related to the personal data described above and their processing are very limited. In light of these considerations, the legitimate interests of all project implementing organizations are clearly present and significantly outweigh any potential risks to the data subjects.
6. Personal data processed and categories of personal data	The personal data processed include: - the name, employer, telephone number, email address, and employer's address of employees of the project implementing organizations and other partner organizations who participate in the project; - the name, email address, employer, telephone number, and employer's address of individuals who register for training sessions and events; and - information on possible allergies of individuals who register for training sessions or events where catering is provided. Allergy information constitutes health-related personal data within the meaning of Article 9 GDPR.
7. Regular data sources	Personal data processed for internal project purposes are obtained either from the employer acting as a project implementing organization or partner organization, or directly from the data subject. Contact details and allergy information related to project training sessions and events are obtained directly from the data subject.
8. Recipients or categories of	The project implementing organizations process personal data related to internal project activities obtained from the implementing

recipients of the data and regular disclosures	organizations themselves or from partner organizations. Such personal data may be disclosed to the aforementioned parties. The personal data are disclosed to the project implementing organizations for the purposes of communication necessary for project implementation. The parties involved in the project are as follows: • Aalto-yliopisto (coordinator) • Centria-ammattikorkeakoulu • Konecranes (Business Finland Veturi -company) • Meyer Turku • Lico Oy • Raision Valmisasennus Oy • Tampereen yliopisto • Baltic Yachts • CSI Composites • Finnester Coatings • Oy Scan Mould Ab • Fibrobotics • Napapiirin Hamppu Oy All personal data collected within the project are stored and processed in the Microsoft Office 365 environment or a supporting cloud service. In this context, Microsoft Inc. acts as a data processor, with whom the controller has concluded a data processing agreement. The above-mentioned processor processes the data solely for purposes related to data storage and ensuring the functioning of the IT infrastructure (e.g. data backup).
9. Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, and whether the data subject is obliged to provide the personal data and the consequences of failure to provide such data	The implementation of a project carried out in cooperation between multiple parties, in accordance with the agreement between the parties and the funding conditions set by the funder, requires smooth communication and cooperation, which cannot be achieved without appropriate personal data. With regard to training sessions organized within the framework of the project, the provision of personal data is necessary in order for an individual to register for and participate in the training session and for the service to be delivered to the individual, including, for example, informing participants of any changes or cancellations.
10. Retention period of personal data	Personal data are retained for the duration of the project and for ten (10) years after the end of the project. The project duration is defined in the funding decision as 1.5.2026-30.4.2029. The project duration may be extended, for example if an extension of the project implementation period is granted by the funder.

	The retention of personal data after the completion of the project is based on the funder's right to carry out audits or inspections related to the project also after the project has ended. Any allergy information provided by individuals who register for training sessions or events is deleted after the relevant event has been organized, once the information is no longer required.
11. Transfer of data outside the EU or EEA	Personal data are not transferred outside the European Union (EU) or the European Economic Area (EEA). With regard to the Microsoft Office 365 environment, the storage location of Centria's data is defined in Centria's service agreement as data centres located within the EU/EEA.
12. Principles of data security	The personal data collected are, from the outset, limited to contact details that are strictly necessary for the purposes of the processing. Personal data related to project implementation are stored solely for internal project use in a password-protected workspace within the Microsoft Office 365 environment. Personal data of individuals who register for training sessions organized within the framework of the project and stored in the Microsoft Office 365 environment are protected within a workspace to which access is granted only to the project implementing parties responsible for organizing the relevant training sessions. The Microsoft Office 365 environment is certified in accordance with the ISO/IEC 27001 information security standard, and the data are also protected by appropriate physical security measures.
13. Automated decision-making and profiling	Personal data are not used for automated decision-making or profiling.
14. Rights of the data subject	Data protection rights depend on the legal basis on which personal data are processed. You can find information about your rights here: Know Your Rights | Office of the Data Protection Ombudsman Where the processing of personal data is based on the data subject's consent, you have the right to withdraw your consent at any time. Where the legal basis for processing is legitimate interest, you do not, as a general rule, have the right to object to the processing as long as the legitimate interest exists. You have the right to lodge a complaint with the supervisory authority, which in Finland is the Office of the Data Protection Ombudsman. You have the right to obtain a copy of your personal data free of charge. Where an individual requests additional copies, the controller

	may charge a reasonable fee based on administrative costs (Article 15(3) of the EU General Data Protection Regulation).