

Privacy Policy

General Data Protection Regulation 2016/679

1. Data Controller

Regional Council of South Karelia
Kauppakatu 40 D
53100 Lappeenranta, FINLAND

2. Data Protection Officer, contact details

Managing Authority
South-East Finland – Russia CBC 2014-2020 Programme
Regional Council of South Karelia
Cross-Border Cooperation unit
Kauppakatu 40 D, 1. Floor
53100 Lappeenranta, FINLAND

IT & Project Analyst
Pasi Sormunen
Mailto: official[at]sefrcbc.fi

3. Name of the Register

Programme Management System, PROMAS

4. Purpose of the processing and the legal basis for the processing

Implementation of the Cross-Border Cooperation programmes during the period 2014-2020 and legal basis of the use of stored data, containing also personal data is based on the

- Council Regulation (EC, Euratom) No 966/2012 on the Financial Regulation and ENI CBC Strategy
- Regulation (EU) No 232/2014 of the European Parliament and of the Council
- Commission Implementing Regulation (EU) No 897/2014
- South-East Finland – Russia CBC 2014-2020 Joint Operational Programme (JOP)
- Financing Agreement between the European Commission, Finland and Russia

Programme Management System (PROMAS) is a tailored web-based service for the Cross-Border Cooperation programmes South-East Finland – Russia CBC 2014-2020, Karelia CBC 2014-2020 and Kolarctic CBC 2014-2020, which allocate funding for the projects, implemented in the eligible territories of Finland and Russia, and in case of Kolarctic, also in Sweden and Norway.

Each programme has its own specific register in common database and access to each programmes' data is restricted by programme specific user rights. PROMAS is used for the managing, monitoring

and auditing of the South-East Finland – Russia CBC 2014-2020 Programme ('Programme') and the individual applications and projects.

Personal data is used only for the Programme purposes and no information is traded, shared or sold outside the Programme bodies. All persons mentioned in the applications and their annexes or any other documents related to the project implementation give their consent that their personal data may be collected, recorded, stored and transferred in databases of the Programme authorities and management bodies.

Such a consent will be secured also from any person, whose name will be included in any future document related to a project.

When you provide any personal data to the Programme, you are deemed to have authorized the collection, retaining and use the data for the following purposes:

- 1) verifying your identity and eligibility to register as a user of the PROMAS and processing your registration as a user with a log-in ID;
- 2) providing you with the customer service and responding to your queries, feedback, claims or disputes;
- 3) facilitating communication between project stakeholders and processing your transactions on the system;
- 4) subject to obtaining your consent in such form as may be required under the applicable law, (including our affiliated companies and their designated service providers defined in the chapter 7) your personal data may be used to provide notices, surveys, product alerts, communications and other Programme specific materials to you;
- 5) performing research or statistical analysis in order to improve the content and layout of the site, to improve our services.
- 6) if you voluntarily submit any other information to the system for publication you are deemed to have given consent to the publication of such information on the system ("Voluntary Information"); and
- 7) making such disclosures as may be required for any of the above purposes or as required by law, regulations and guidelines or in respect of any investigations, claims or potential claims brought on or against us.

5. Register data content

The following information may be collected and stored of all registered persons and may be handled and processed.

- 1) Application and its annexes, documents relating to project implementation
 - Name, position in organization, title, working address, e-mail address, phone number, tasks and position in the project, salary, working hours, employment contract, photo and cv.

When registering to the system, the user ID, password and registration e-mail address are stored also in cases where the application is not submitted.

- 2) Programme bodies, such as Managing Authority and its Branch Office in Russia, Members of the Joint Selection and Joint Monitoring Committees, Audit Authorities and external experts contracted by the Managing Authority.
 - Name, position in organization, title, working address, e-mail address, phone number, photo.
- 3) Any change requests concerning the above mentioned.

6. Collection of information. The sources from where the personal data originates

We hereby assure that no more information is collected and stored from you than what is necessary to provide you with the mentioned services and that all necessary steps are taken to ensure protection of your personal data. Information of the applicants and project partners is collected from the applications and their annexes and documents related to the project implementation.

7. Disclosure of personal data

Information may be transferred to the Data Controller's assortments to parties who deal with information on behalf of the Data Controller on the basis of a cooperation agreement between the Data Controller organization and subcontracting parties. In this case, the data processor is not entitled to process the transferred data for his own account, in his own personal registers.

All application and project data, with all of its annexes in PROMAS is available for the appointed representatives of the Programme bodies, mentioned in section 5. In the Russian Federation, Finland and the European Union.

All application and project data, with all of its annexes in PROMAS may be processed by the PROMAS service providers, Navidium PLC, Oulu Finland, named technical support staff in their office in India.

The information may also be disclosed if the competent authority requests and the request is based on existing legislation in the Russian Federation, Finland or the European Union.

8. Data Security and storing periods

To prevent unauthorized access and to ensure proper and safe storage, all data is protected by access control and continuous monitoring. The information in PROMAS is protected by generally accepted technical means like user specific user IDs, passwords, firewalls and other relevant information security services.

Manually maintained material is stored in premises where unauthorized access is denied.

In accordance with the Commission Implementing Regulations (EU) No 879/2014 and National legislation of the member state, all data in PROMAS is stored for five (5) years after the final payment of the Programme and after the retention time, properly deleted.

Only those, who have been identified and authorized by the Data Controller, will have access to the stored information during the retention time.

9. Right to access/correct personal data

Under the General Data Protection Regulation Act (EU) 2016/679 (GDPR) you have right to check your personal data stored in PROMAS by contacting the Data Protection Officer. Upon request, the data is adjusted and supplemented or erroneous, unnecessary, incomplete or outdated information is removed.

Checking and updating information is done by submitting a written request either by email or by mail to the Managing Authority.

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10. Changes to this Privacy Policy

Our operations are constantly being developed and we reserve the right to change this Privacy Policy. Changes may also be based on changes in legislation. Changes are notified via PROMAS login page and they will be effective immediately. You agree that any information stored about you (as described in this Privacy Policy and whether or not collected prior to or after the new Privacy Policy became effective) will be governed by the latest version of the Privacy Policy.

We recommend that you check regularly with the content of the Privacy Policy.