

## Data Protection Description

In accordance with EU General Data Protection Regulation (2016/679, "GDPR").

Version 1.0, date 26.2.2020. This Data Protection Description may be subject to changes from time to time due to i.a. changes in Service, legislation and/or legal interpretations.

### 1. Object of the processing

VTT's ManuMaturity Tool ("Service")

### 2. Controller, data protection officer and contact person

Controller

Name: VTT Technical Research Centre of Finland Ltd. ("VTT"), Business ID: 2647375-4

Address: Vuorimiehentie 3, 02150 Espoo, Finland

Data protection officer (DPO):

Name: Seppo Viinikainen

Address: VTT Technical Research Centre of Finland Ltd., Koivurannantie 1, 40400 Jyväskylä, Finland

E-mail: [dataprotection@vtt.fi](mailto:dataprotection@vtt.fi) (DPO, data security manager and legal counsel), or [Seppo.Viinikainen@vtt.fi](mailto:Seppo.Viinikainen@vtt.fi) (DPO)

Contact person concerning the register:

Name: Olli Kuusisto

Address: VTT Technical Research Centre of Finland Ltd., Vuorimiehentie 3, 02150 Espoo, Finland

E-mail: [manumaturity@vtt.fi](mailto:manumaturity@vtt.fi)

### 3. Categories of personal data and data subjects

The data subjects: users of the Service.

The categories of the processed personal data: i.a. data subject's name, position in organisation (upper management/ middle management/ expert), contact information (phone number, organisation's postal code, email) and password (stored with cryptographic hash).

### 4. Purposes of the processing and the legal basis for the processing

The personal data is processed for the following purposes:

- Implementation of Service, such as:
  - Confirming registration and other access right management. Monitoring and investigating possible misuse.
  - Providing organisation's ManuMaturity level assessment to the data subject.
  - Generating statistical summaries and reference data using the data subject's responses as part of Service's functionality to the data subject and other users of Service.
- Contacting with respect to Service contents: Contacting for discussion concerning Service results and planning of possible future collaboration.

The personal data is processed for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. The processing of name and contact information (email, organisation's postal code and phone number) is necessary for implementation of Service and establishment of the contractual relationship.

## **5. Regular sources of information**

The personal data is collected from the data subject in connection with the registration and use of Service.

## **6. Recipients or categories of recipients of the personal data**

As a main rule, the controller does not provide access to the personal data to any third parties.

The controller may provide third parties with access to personal data if this is necessary for technical reasons related to Service, such as cost efficient technical implementation of Service, and/or if GDPR or applicable legislation requires disclosure for instance to competent authorities. In these cases, access is granted under appropriate arrangements in accordance with GDPR and applicable legislation taken into account i.a. requirement to inform the data subject.

## **7. Transfer of data outside the European Union or the European Economic Area**

As a main rule, the personal data is not transferred outside European Union ("EU") or European Economic Area ("EEA").

If the transfer of personal data outside EU or EEA is at a later stage necessary, i.a. due to technical reason related to Service, such as cost efficient implementation of Service, such transfer shall be carried out in compliance with GDPR and applicable legislation.

## **8. The existence of automated decision-making, including profiling**

No automated decision-making or profiling is done.

## **9. The period for which the personal data is stored or the criteria used to determine that period**

The personal data is stored as long as the user account of the data subject in Service is in force. In case the data subject wishes to remove his or her user count, this can be done by contacting the controller using the contact information set forth in Section 2 ([manumaturity@vtt.fi](mailto:manumaturity@vtt.fi)) preferably from an email address which the data subject presumes to be known to the controller.

After this the personal data is either removed or anonymised, unless other legal basis for processing remains.

## **10. Principles of protection of the register**

The personal data is protected with technical and organizational measures from unauthorized processing and access. The personal data is stored in a database to which only administrators of said server have direct access, and the database is secured with VTT-level firewall. The access to the personal data is limited to the controller's application owner, main user(s) and IT contact person(s) who are bound by confidentiality obligation.

The server where the data is stored is located in Finland under VTT administered virtual server, in VTT's premises. The registration to Service and use of Services is protected with personal password, which are stored with cryptographic hash. The Service uses TLS and SSL protocols, all data transfer from the user's personal computer or other device is strongly protected with 128 bit SSL encryption. The server is authenticated with certificate granted by TERENA.

## **11. Rights of the data subject**

The data subject has the following rights, which may be exempted from in accordance with GDPR and applicable legislation.

**The data subject can exercise the rights by contacting the controller with information set forth in section 2, preferably in writing. The data subject is advised, whenever possible, to use such email address for contacting, which the data subject presumes to be known to the controller in connection with the Service.**

### **Right of access**

The data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is processed and access to his or her personal data and in accordance with GDPR information concerning the processing of his or her personal data.

### **Right to rectification**

The data subject has the right to obtain from the controller rectification of inaccurate personal data concerning him or her, and the right to have incomplete personal data completed.

### **Right to erasure**

The data subjects has the right to obtain from the controller the erasure of personal data concerning him or her if (i) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed; (iii) the personal data have been unlawfully processed; (iv) the personal data have to be erased for compliance with a legal obligation in Union or Finnish law.

### **Right to restriction of processing**

The data subject has the right to obtain from the controller restriction of processing in cases set forth in GDPR.

### **Right to data portability**

Where the processing is based on contract and is carried out by automated means, the data subject has the right to receive the personal data concerning him or her, which he or she has provided to the controller and have the right to transmit those data to another controller.

### **Right to lodge a complaint with a supervisory authority**

The data subject has the right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data breaches the data subject's rights pursuant to GDPR.