

Privacy Notice for Research

In accordance with EU General Data Protection Regulation (2016/679, "GDPR") and applicable national legislation (including Finnish Data Protection Act 1050/2018). Privacy notice is for purpose of informing the data subject about processing of personal data and his/ her data protection rights.

1. Name, duration and nature of the study

Name of the research: FinH2 - Finnish value chain analysis for Finnish electrolyzer technology.

Questionnaire for companies.

Duration of the research: 1.1.2022-31.12.2024

2. Controller(s), data protection officer(s) and contact person(s)

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

Address: Tekniikantie 21, 02150 Espoo, Finland

Contact information for data protection officer (DPO) :

Address: VTT Technical Research Centre of Finland Ltd., Register Office, P.O. Box 1000, FI-02044 VTT, Finland

E-mail: dataprotection@vtt.fi (DPO, data security and their substitutes)

Contact person or responsible research group of the study:

Name: Elina Mäki

Address: VTT Oy, Tekniikantie 21, 02150 Espoo

E-mail: elina.maki@vtt.fi

3. Personal data categories

Processed personal data categories: Email address

The data subjects represent: Research participants

4. Purpose and legal basis of processing

Purpose of personal data processing:

The purpose of the questionnaire is to create a clear picture of companies operating today or operating possibly in the future in Finnish hydrogen economy in order to advance the development of national hydrogen value chains and map future research needs.

Email address will be collected with a separate consent of the respondent/data subject in order to contact the data subject if needed regarding further questions and/or possible further projects. In addition, the name of the company will be collected in order to position the company to the relevant place in Finnish hydrogen value chain. The name of the company can be published in project's public research report upon separate consent of the data subject.

Legal basis of processing¹:

- Performance of a task carried out in the public interest
- scientific or historical research purposes or statistical purposes

5. Data sources

Personal data is received from the data subject.

6. Recipients or categories of recipients

Unanonymized personal data is not provided outside the register.

7. Transfers outside the European Union or the European Economic Area

Personal data is transferred outside the European Union or the European Economic Area (noting i.a. location of servers and other access rights of service providers):

- No
- Not yet known but possible. Mechanism defined and informed on a case-by-case basis. The Teams software used in the project involves a possibility for data transfer outside the EEA area (right to produce support services for cloud services outside EEA).
- Yes, on the following basis:
 - Commission adequacy decision
 - Binding corporate rules
 - Commission standard data protection clauses
 - Other:

8. Retention period of personal data after the research

- Research data and personal data is destroyed after the research.
- After the research, research data is retained for only the period necessary and
 - personal data is anonymised
 - personal data is pseudonymised
 - it contains direct identifiers of the data subject, for the following reason:

Research data is stored at Teams folder having two-phase authentication system.

9. Protection principles

In performance of research, research data:

- is anonymized before commencing the research
- is pseudonymised before commencing the research
- contains direct identifiers of the data subjects. However, the data is aimed to be anonymized as fast as possible and already before storing it in the electronic system.

¹ GDPR Art. 6 and Finnish Data Protection Act 4 §.

Manually processed personal data is protected by restricting the access to data controller's premises.

Personal data processed in data systems is protected with:

- user name
- password
- multi-factor authentication (MFA)
- access control with IP address
- user monitoring (log)
- access control

Encryption method of data transmission:

- in transmission
- for data file
- other, what: Personal information is not transferred. Only anonymized information can be transferred to VTT's research partners.

10. Rights of the data subjects

The data subjects have the rights listed below, which however may be exempted from and/or not applied on grounds set forth in applicable legislation. Exemptions and restrictions are considered for each case separately.

The data subject can exercise these rights by contacting Controller with information set forth in section 2, preferably by email.

- Right of access
- Right to rectification
- Right to restriction of processing
- Right to object
- Right to lodge a complaint with a supervisory authority

Further description of data subject's rights:

Right of access

The data subjects have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed and access to his or her personal data and information concerning the processing of his or her personal data.

Right to rectification

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

Right to restriction of processing

The data subjects have the right to obtain from the controller restriction of processing.

Right to object

The data subjects have the right to object to processing of personal data concerning him or her.

Right to lodge a complaint with a supervisory authority

The data subjects have a 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 applicable law. In Finland, see Finnish Data Protection Ombudsman contact information:

<https://tietosuoja.fi/en/contact-information>