

PRIVACY NOTICE

1. Object of the privacy notice

Micronova cleanroom personnel and users

2. Joint controllers

Aalto University Foundation sr. ("Aalto"), business ID: 2228357-4, PO Box 11000, 00076 AALTO

Data protection officer:

Mail address: Aalto University, Kirjaamo, PO Box 11000, 00076 AALTO

Email: dpo@aalto.fi

VTT Technical Research Centre of Finland Ltd. ("VTT"), business ID: 2647375-4, Vuorimiehentie 3, 02150 Espoo

Data protection officer:

Mail address: VTT Technical Research Centre of Finland Ltd, Register office, P.O. Box 1000, FI-02044 VTT, Finland

Email: tietosuoja@vtt.fi (DPO, data security and their substitutes)

3. Joint controller roles

The data object may exercise individual's rights by contacting Aalto data protection officer (dpo@aalto.fi). As required, Aalto data protection officer pass the request to VTT, for implementing the rights of the data subject when receiving the information.

4. Purpose of processing personal data, categories, and legal basis for processing

Purpose	Personal data categories	Data subject	Legal basis
User management, resource allocation and follow up.	Contact and basic information (e.g. first name, last name, user ID, password, email, telephone) Basic information (e.g. sex, birthday, user group, organization, department, team) Information related to the cleanroom use (e.g. use hours, area, trainer, courses)	Agreement and invoicing contact (customers), cleanroom users (personnel, customers, other users)	Legitimate interests pursued by the Controller(s) or by a third party (General Data Protection Regulation, act 6 art. f): Right to allocate and follow the use of the resources and use the usage data for the purposes of fulfilment of the contractual obligations and operational development.
Invoicing	Contact and basic information (first name, last name, user ID, password, email, telephone) Basic information (organization) Information related to the cleanroom use (use hours)	Agreement and invoicing contact (customers), cleanroom users (personnel, customers, other users)	Legitimate interests pursued by the Controller(s) or by a third party (General Data Protection Regulation, act 6 art. f): Right to allocate and follow the use of the resources and use the usage data for the purposes of invoicing.

Purpose	Personal data categories	Data subject	Legal basis
Facility, safety, and security management (camera surveillance, access control and door phone system)	First name, last name, telephone number, email address, camera recordings, company related information, access rights, identification badges and key information, location of workplace.	Users of the facilities (personnel, customers, other users)	Legitimate interests pursued by the Controller(s) or by a third party (General Data Protection Regulation, act 6 art. f)): User and data controller legal right and security protection, employer and employee property protection, criminal action and misuse prevention and resolving.
Visitor management	First name, last name, company information, email address, identification card information	Persons visiting in the area.	Legitimate interests pursued by the Controller(s) or by a third party (General Data Protection Regulation, act 6 art. f)): User and data controller legal right and security protection, employer and employee property protection, criminal action and misuse prevention and resolving. Visit guidance and support. Safety of the visiting persons.
Information sharing and communication	Email address, name (firstname, lastname)	Agreement and invoicing contact (customers), cleanroom users (personnel, customers, other users)	Legitimate interests pursued by the Controller(s) or by a third party (General Data Protection Regulation, act 6 art. f)): Organizing the cleanroom and equipment use and related communication.
Reporting to the financiers	Name, organisation details, thesis information, education and examination information, publications, invention and patent information	Cleanroom personnel (personnel) Area users (personnel, customers, other users)	Legitimate interests pursued by the Controller(s) or by a third party (General Data Protection Regulation, act 6 art. f)): Facility use and overall operation reporting to the financiers to fulfill data controller contractual obligations.
Reporting to Finnish Academy, OTANANO infra roadmap.	Name, ORCID-ID (as available), sex, birth year, nationality, field of study, research career stage, FTE, facility related travelling (over 5 days/ over 1 months)	Cleanroom personnel (personnel)	Legitimate interests pursued by the Controller(s) or by a third party (General Data Protection Regulation, act 6 art. f)): Facility use and overall operation reporting to fulfill data controller contractual obligations
Reporting to Finnish Academy,	Pseudonymised statistical information	Cleanroom users (personnel,	Legitimate interests pursued by the Controller(s) or by a

Purpose	Personal data categories	Data subject	Legal basis
OTANANO infra roadmap.		customers, other users)	third party (General Data Protection Regulation, act 6 art. f)): Facility use and overall operation reporting to fulfill data controller contractual obligations
Reporting to other potential financiers and other external communication	Pseudonymised statistical information	Cleanroom users (personnel, customers, other users)	Legitimate interests pursued by the Controller(s) or by a third party (General Data Protection Regulation, act 6 art. f)): Facility use general reporting and communication related to facility operation.

5. Regular sources of information

Purpose of the processing	Source of information
User management, resource allocation and follow up Invoicing	Personal data is mainly collected from the data subject him/herself. Systems in use are LIMS as well as VTT diary and Aalto PESO-system (see paragraph 6).
Facility, safety and security management (camera surveillance, access control and door phone system) Visitor management	Systems used for information collection: VTT personnel system, digital and analog cameras (camera surveillance), person's or their supervisor's or service provider's key management documents (Keycontrol-software) and access permit applications (access control system Tim22, SE), key control systems (Cliq, Traka and Keycontrol), access card readers, digital door phones (Door phone system) as well as information collected from the visitors by the lobby service and visitor system. Diary in cleanroom entry.
Information sharing and communication	Personal data is mainly collected from the data subject him/herself (LIMS system)
Reporting to the financiers and other external communication	Personal data is mainly collected from the data subject him/herself (LIMS, PESO, VTT Diary systems), Aalto IT-systems, finance and HR systems, study register, AaltoDocs, innovation service systems.

6. Recipients or categories of recipients of personal data

Recipient or processor of personal data	Purpose and role of the receiver or processor
Financiers (e.g. Academy of Finland, EU)	Reporting to the financier about facility overall operation and impact.
LIMS-system: Iver Sverige AB	LIMS-system is used for supporting resource reservations, communication and user rights management. LIMS system operational support and development.
Diary: Codemen Oy	Diary system operational support and development.
PESO: Codemen Oy	PESO system operational support and development.
Customers	Allocation of billing and breakdown of billing criteria

Data controller has the right to change the service providers for data processing, as an example during tendering. Such changes will be informed by updating privacy notice.

7. Transfer of personal data outside the EU and the EEA

Moving personal data outside EU / EEA:

- No
 Personal data can be moved outside EU / EEA

Receiver and target country	Basis according to General Data Protection Regulation, V))
	<input type="checkbox"/> Commission adequacy decision <input type="checkbox"/> Binding corporate rules. <input type="checkbox"/> Commission standard data protection clauses <input type="checkbox"/> Other:

8. The period for which personal data is stored.

Personal data is stored maximum of 5 years after ending the use of the cleanroom facility. After the period the data is deleted or anonymized.

9. Principles of data protection

Personal data is stored in secure systems and areas with surveillance. The data is processed by Aalto and VTT personnel as well as their service providers' personnel who have the right based on their work role and who are bound by confidentiality obligation.

10. Rights of the data subject

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 Aalto data protection officer according to section 3.

Legal basis of processing is **“Legitimate interests pursued by the Controller(s) or by a third party”**

- Right of access
- Right to rectification

- Right to erasure (“right to be forgotten”)
- 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 erasure (“right to be forgotten”)

The data subjects have the right to obtain from the controller the erasure of personal data concerning him or her.

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/conta>