Privacy notice for data subjects

This notice contains information required by Articles 13 and 14 of the General Data Protection Regulation of the EU.

<table>
<thead>
<tr>
<th>Name of the register:</th>
<th>Customer register of ESA BIC Finland at Aalto University</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date:</td>
<td>30 June 2021</td>
</tr>
</tbody>
</table>

**Controller, contact person and person in charge of the register**

Aalto University Foundation
Postal address: P.O. Box 11000, FI-00076 AALTO, Finland
Street address: Otakaari 24, 02150 Espoo, Finland
Tel.: (exchange) +358 9 47001

ESA BIC Finland
Kimmo Isbjörnssund, Head of ESA BIC Finland

**Data protection officer and contact details**

Anni Tuomela, Data Protection Officer, Aalto University
Postal address: P.O. Box 11000, FI-00076 AALTO, Finland
Street address: Otakaari 24, 02150 Espoo, Finland
Tel.: (exchange) +358 9 47 001
Email: dpo@aalto.fi

**Purpose of the register, legal basis for processing personal data**

The purpose of the processing of personal data stored in this register is the administration of application and contractual matters involving the ESA BIC Finland and the customers using its incubation services.

The processing of personal data is subject to the Act on the Openness of Government Activities (621/1999) and legislation on data protection.

ESA BIC Finland provides business incubation services and collects customer data in order to review and accept applications in collaboration with ESA the European Space Agency, Business Finland and/or other partner subject to Non-Disclosure Agreements, sign agreements on incubation services, manage said agreements and, upon their entry into force, implement the agreed services.

The legal bases of the processing of personal data is that processing is necessary 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. We will not process personal data based on consent.

**A: Is the personal data collected directly from data subject?**

Yes
<table>
<thead>
<tr>
<th><strong>B: Is the personal data collected from another source than the data subject?</strong></th>
<th>No</th>
</tr>
</thead>
</table>
| **Data contained in the register (description of the categories of data subjects and the categories of personal data)** | The personal data processed is limited to what is necessary. Such data includes but is not limited to:  
**Name of company**  
Names of the company and team members email addresses  
Telephone numbers  
Addressess  
Period of validity of the agreement  
Date of expiration of the agreement |
| **Recipients or categories of recipients of the personal data (i.e. disclosure of personal data)** | Personal data is processed only by ESA BIC Finland employees or those contracted individuals working on behalf of ESA BIC Finland and Aalto University who have a right to process the data. The contact information is regularly disclosed to the ESA BIC Finland alumni and partner register (CRM). |
| **Transfer of personal data to third countries** | The data protection policy of the university is to exercise particular care if transferring personal data outside the EU and EEA to countries that do not offer the level of data protection required by the European General Data Protection Regulation (GDPR). Transfers of personal data outside the EU and EEA are done in accordance with the requirements of the GDPR. |
| **Period for which personal data is stored / Criteria used to determine this period** | The periods for which personal data saved in systems and manual material are stored are based on the law and the Records Management Plan of Aalto University and ESA BIC Finland.  
In line with the university’s Records Management Plan, personal data will be stored for the duration of the customer relationship (the period of validity of the agreement) and a minimum of six (6) years after the end of the customer relationship or even a longer time if required by a project financer. |
| **Rights of the data subject** | The data subject has the right to access their personal data. Requests for access should be sent to esabicfinland@aalto.fi. The data subject has a right to demand the rectification of inaccurate personal data concerning him or her. The data subject may demand rectification by sending an email to esabicfinland@aalto.fi.  
The data subject has the right to bring matters concerning the lawfulness of the university’s data protection operations to the Office of the Data Protection Ombudsman for evaluation by sending an email to tietosuoja@om.fi.  