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| 1.<br>Name of the data file                              | FINANCING AND PROGRAMMES: <b>Kolarctic CBC</b>  |
| 2.<br>Controller   | REGIONAL COUNCIL OF LAPLAND<br>Hallituskatu 20 B, 96100 ROVANIEMI   |
| 3.<br>Contact person in matters concerning the data file | Administrative Director, info(at)lapinliitto.fi<br>Hallituskatu 20 B<br>96100 Rovaniemi   |
| 4.<br>Purpose of the processing of personal data         | <p>Personal data are processed for managing duties of the Managing Authority of the Kolarctic ENI CBC Programme. As the Managing Authority, the Regional Council of Lapland is responsible for the administration and implementation of the Programme. The European Neighbourhood Instrument (ENI) is a financing instrument of the European Neighbourhood Policy (ENP). Its target countries are partner countries in the neighbourhood policy and Russia. The instrument supports cross-border cooperation (ENI CBC, European Neighbourhood Instrument Cross-Border Co-operation).</p> <p>An agreement called the “Financial Agreement on Financing and Implementation of Cross Border Cooperation Programme Kolarctic 2014–2020” has been signed between the European Commission, the Russian Federation, the Republic of Finland and the Kingdom of Sweden for funding and implementing the Programme.</p>  |
| 5.<br>Contents of the data file                          | <p>Tasks related to the administration of the Programme in which personal data are processed:</p> <ul style="list-style-type: none"> <li>- Details on members of the Programme bodies, specified in the Description of the Management and Control Systems, are collected for maintaining contacts, communication, and convening of meetings. Person’s name, organisation, position, email, work address and phone number:</li> <li>- Names and organisations of participants are recorded in minutes of meetings held by the Programme bodies;</li> <li>- The name and signature of a member of a Programme body or the personnel for Declarations of Impartiality and Confidentiality;</li> <li>- Reports and requests for payment to the European Commission include the contact persons’ names, work addresses and email addresses. Requests for payment include payroll details on employees working in the Programme at the Regional Council of Lapland;</li> <li>- Furthermore, on events there are lists of participants collected, as well as mailing lists for communication, including a person’s name, organisation and contact details.</li> </ul> <p>Tasks related to the implementation of the Programme in which personal data are processed:</p> <ul style="list-style-type: none"> <li>- Applications for funding and annexes thereto include the contact person's name, position, organisation, email address, work address and telephone number;</li> <li>- Project reporting materials include the contact person's name, work address, email address, phone number, position, organisation;</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>- Materials received from projects can also include payroll details on persons working on the projects, lists of participants, and documents including photographs and names of individuals. Such materials are saved with project documents, and the Regional Council of Lapland is not the controller, referred to in the Act, of these data;</li> <li>- The Grant Contract and its annexes include the contact person's name, position and organisation;</li> <li>- Payment decisions include the name, position and organisation of the person who made the decision, and details on contact persons at the recipient organisation.</li> </ul>  |
| 6.<br>Regular sources of data                | The data come from organisations that apply for and receive funding, the Programme's National Authorities, the Programme bodies, documents from personnel administration at the Regional Council of Lapland, i.e. the employer, and lists of participants collected during meetings and events.  |
| 7.<br>Regular disclosure of data             | <p>Data are disclosed to the European Commission and to the national responsibility and audit authorities responsible for the Programme in Russia, Sweden, Norway, and Finland.</p> <p>Minutes of the Joint Monitoring Committee and names and photographs of individuals working for the Programme are published on the Programme's website at <a href="http://kolarctic.info">http://kolarctic.info</a></p>  |
| 8.<br>Transfer of data outside the EU or EEA | <p>Data are disclosed to Russia's national audit authorities and Programme authorities. Contact details on persons working for projects are disclosed to the Russian Programme authorities: name, job title and, possibly, payroll and name details on individuals working for funded projects.</p> <p>During the assessment phase of grant applications and upon the making of a financing decision, details contained in the applications are, in their entirety, visible to members of the Programme bodies in the PROMAS system.</p> <p>The PROMAS system is developed and maintained by Navidium Plc, a contractual partner of the Regional Council of Lapland. Navidium Plc has subcontractors outside the EU, such as in India.</p> |
| 9.<br>Principles of securing the data file   | <p>Manual material:<br/>                 Materials produced by the Programme's Managing Authority and manual material obtained from projects are stored on the Managing Authority's premises for the duration of the implementation of the Programme. The locked office can only be accessed by employees of the Managing Authority.</p> <p>Materials related to the Programme and individual projects, which are stored permanently, are stored, in paper format, after the end of the Programme at the archives of the Regional Council of Lapland that can only be accessed by persons responsible for the archives.</p>  |
|  | Electronic material:   |

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|  | <p>Material related to the work of the Managing Authority is stored, in electronic format, in a separate folder of the Programme on the server of the Regional Council of Lapland. The stored material can only be viewed by persons with access rights granted by the Regional Council of Lapland.</p> <p>Some material is also stored in the Dynasty case management system of the Regional Council of Lapland, in accordance with the document management guidelines of the Regional Council of Lapland.</p> <p>The electronic PROMAS system is used for managing and processing the Programme and individual applications. The system was specifically developed for the needs of Programmes across the external borders between the EU and Russia (CBC) operating in Finland. The PROMAS system is used for storing project applications, executive orders, Grant Contracts and annexes thereto, payment requests and decisions, and other materials related to projects. The PROMAS system can only be used by persons managing the specific task, and it can only be accessed with a personal username and password. The PROMAS system has access right levels used for restricting details that can be viewed by various user groups.</p> |
| 10.<br>Right of access   | <p>Data subjects have right of access to data concerning them. Data subjects have right of access to documents concerning them, free of charge, once a year (Personal Data Act, Section 26). A request for access should be sent, in writing, to the Administrative Director of the Regional Council of Lapland at: info(at)lapinliitto.fi</p>  |
| 11.<br>Right to request rectification of data                  | <p>The controller shall, on its own initiative or at the request of the data subject, without undue delay rectify, erase or supplement personal data contained in its personal data file and erroneous, unnecessary, incomplete or obsolete as regards the purpose of the processing. The controller shall also prevent the dissemination of such data, if this could compromise the protection of the privacy of the data subject or his/her rights.</p> <p>If the controller refuses the request of a data subject of the rectification of an error, a written certificate to this effect shall be issued. In this event, the data subject may bring the matter to the attention of the Data Protection Ombudsman. (Personal Data Act, Section 29).</p>   |
| 12.<br>Other rights related to the processing of personal data | <p>A data subject has the right to prohibit the controller to process personal data for purposes of direct advertising, distance selling, other direct marketing, market research, opinion polls, public registers or genealogical research (Personal Data Act, Section 30). Such a prohibition must be submitted to the controller in writing.</p>   |
| 13.<br>Storage periods   | <ul style="list-style-type: none"> <li>- Documents related to administration of the Programme by the Managing Authority are stored in accordance with the filing guidelines of the Regional Council of Lapland, but at least for five years after the last payment decision made by the European Commission for the Kolarctic CBC Programme.</li> <li>- Project materials are stored, in their entirety, for five years after the last payment decision made by the European Commission for the Kolarctic CBC Programme. Af-</li> </ul>   |

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|  | <p>ter this, the material is screened, documents stored for a prescribed period are destroyed appropriately, and documents stored permanently are filed in the permanent archives of the Regional Council of Lapland.</p> |
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|  | <p>The PROMAS system is moved to a filing facility, to the server of the software supplier, after active use ends at the end of the execution period of the Programme. After this, the material is stored in the archives for five years after the last payment decision made by the European Commission for the Kolarctic CBC Programme.</p> |
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