

**PRIVACY NOTICE****Project CLIBUS****EU's General Data Protection Regulation (2016/679),  
Articles 13 and 14****Date: 23 June 2025****Updated:*****Purpose of personal data processing***

The data is collected and processed for the reporting and communication purposes of the Interreg Europe project *Runway to carbon neutrality – Involvement of business communities in climate strategies*, briefly *CLIBUS*. LAB University of Applied Sciences is the Lead Partner of the project and responsible for the project coordination and communication.

CLIBUS aims to improve local and regional policy instruments to better support the preconditions of SMEs and business communities in implementing energy efficiency and greenhouse gas reduction measures. CLIBUS promotes interregional cooperation and knowledge exchange on selected themes, helping public authorities to build the capacity needed to drive change. This is achieved through collaborative meetings, discussions, site visits, and the exchange of good practices.

As part of the project CLIBUS, LAB organises interregional and regional events as well as disseminates project news and results via project newsletter, for which the data is collected.

***Contents of data file***

In case of registering to events, LAB collects the following information on you: name, title, organisation, email, phone and possible dietary requirements.

In case of subscribing the newsletter, LAB collects the following information on you: email.

The personal data will be stored securely in compliance with the General Data Protection Regulation (GDPR) by LAB University of Applied Sciences (the lead partner of the CLIBUS project) until the project is officially closed in 2029.

***Legal basis of personal data processing***

The collection of personal data for projects is based on the data subject's consent.

***Data sources***

The data is collected from the data subjects themselves. Data may be collected by using electronic forms service of Webropol and newsletter service MailChimp through project CLIBUS homepage (<https://interregeurope.eu/clibus/>, a public-access page).

## ***Data transfer and disclosure***

The data collected by Webropol and Mailchimp services are stored in the servers of the service providers. Back-up copies of the data are stored at LAB servers. Only project personnel of CLIBUS, working in LAB, have access to the data. Data is not transferred for project external use except the collection and storage of data by the mentioned services.

In case of project events, your name, title and organisation, may be transferred upon a separate request to a project partner or a collaborative party that is responsible in organising the event in question (e.g., site visit to a company).

## ***Data transfer and disclosure beyond the EU or EEA***

The data may be transferred beyond the EU and EEA due to the use of service of MailChimp.

## ***Security of the collected data***

Personal access to the Webropol and MailChimp databases as well as to the back-up copies stored at LAB servers is provided only to project personnel of CLIBUS working in LAB.

The university's information security rules and guidelines apply to the management of information systems that process personal data. The information systems and their user interfaces are technically protected e.g. with a firewall, encryptions and data backups. The data may be accessed only by those with a username for the system. Usernames are personal, and user rights to information systems are limited through user group definitions: each user may only access data that they need for their professional duties for the duration of their employment relationship. Printed documents are stored and safeguarded from external access.

## ***Data storage***

The collected data will be stored for the duration of the project 1.5.2025-31.7.2029.

## ***Automated decision-making***

No automated decision-making takes place in the data processing.

## ***Rights of the data subject***

Data subjects have the right to withdraw their consent if the data processing is based on consent.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if the subjects consider that the data processing regarding them is in breach of data processing legislation in force.

Data subjects have the following rights under the EU's General Data Protection Regulation:

- a) Right of access to data concerning the data subject (article 15).
- b) Right to rectification of data (article 16).
- c) Right to erasure of data (article 17).
- d) Right to restriction of processing (article 18).
- e) Right to data portability to another data controller (article 20).
- f) Right to object (article 21).

## ***Data filing system***

LAB University of Applied Sciences: CLIBUS Participant lists  
LAB University of Applied Sciences: CLIBUS Newsletter subscribers  
1.5.2025-31.7.2029

**Data controller**

LAB University of Applied Sciences  
Business ID: 2630644-6  
Address: Mikkulankatu 19, 15210 Lahti, Finland  
Phone: +358 3 828 18  
Email: [helpdesk@lut.fi](mailto:helpdesk@lut.fi)

**Contact person**

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**Parties and division of duties in a collaborative project**

EU Interreg Europe co-funded project CLIBUS, 'Runway to carbon neutrality – Involvement of business communities in climate strategies' is an interregional collaboration project implemented by LAB University of Applied Sciences (Finland), City of Imatra (Finland), Hillerød Municipality (Denmark), Centre for Research and Technology Hellas (Greece), Region of Thessaly (Greece), City of Eindhoven (Netherlands) and Executive Committee of the Rivne City Council (Ukraine). LAB as the project coordinator is responsible for the project management of CLIBUS. All project partners are responsible for the regional implementation of the project as well as participation to the interregional cooperation.

**Director in charge of the project**

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**Project executors**

Project manager, communication manager, financial manager and project experts

**LAB's data protection officer**

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