

PRIVACY NOTICE**Circular Ports -Deploying circular economy in port environments****EU's General Data Protection Regulation (2016/679),****Articles 13 and 14****Date: 15/12/2025****Updated: 30/01/2026*****Purpose of personal data processing***

The data is collected and processed for the reporting, communication and publishing purposes of the Interreg Baltic Sea Region project *Circular Ports -Deploying circular economy in port environments*, briefly *Circular Ports*. LAB University of Applied Sciences is the Partner of the project.

Interreg Baltic Sea Region co-funded project Circular Ports -Deploying Circular Economy in Port Environments, is an international cooperation project implemented by multiple partners across the Baltic Sea Region. The project brings together port authorities, local public bodies, higher education institutions, enterprises, waste management actors and circular economy experts to develop, pilot and scale circular solutions within port environments. Circular Ports project focuses on identifying industrial symbiosis opportunities, improving waste and material flow management, and creating viable circular business models that can be replicated across the region in the port environments. This is achieved through collaborative meetings, discussions, site visits, and the exchange of good practices.

LAB University of Applied Sciences participates as a project partner and develops a digital material-flow platform as part of pilot in Finland. The main pilot environment is in the Finnish port Mustola in Lappeenranta. Digital material-flow platform aims to increase transparency, support circular collaboration and facilitate the creation of circular economy solutions among port-area stakeholders. All project partners contribute to regional pilot actions as well as to the interregional exchange of knowledge, ensuring that the Circular Ports models, tools and methodologies can be scaled across the Baltic Sea Region

As part of the project Circular Ports, LAB organises interregional and regional events as well as disseminates project news and results via project website, social media and publications, for which the data is collected. In Circular Ports project, project partners organise also regional events where LAB is not involved in, and thus, the protection of personal data related to these events are covered by data protection policies of the partners in question.

Contents of data file

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

In case of participating in the interviews, LAB collects the following information on you: name, title, organisation, email and phone number.

The personal data will be stored securely in compliance with the General Data Protection Regulation (GDPR) by LAB University of Applied Sciences until the project is officially closed in 2028.

Legal basis of personal data processing

The collection of personal data for projects is usually 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 form services, such as, Webropol, through project Circular Ports homepage (<https://interreg-baltic.eu/project/circular-ports/> and <https://lab.fi/en/project/circular-ports-deploying-circular-economy-port-environments>) or LAB's project employers email.

Data transfer and disclosure

The data collected by Webropol service is stored in the servers of the service providers. Back-up copies of the data are stored at LAB servers. Only project personnel of Circular Ports, 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). The project partner in question is allowed to use data only for organising the event in question or for reporting to the funder. The collaborative party in question is allowed to use data only for organising the event in question.

Data transfer and disclosure beyond the EU or EEA

The data will not be transferred beyond the EU or EEA.

Security of the collected data

Personal access to the Webropol databases as well as to the back-up copies stored at LAB servers is provided only to project personnel of Circular Ports 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 1.3.2025-29.2.2028.

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 subjects can request erasure of data by contacting the Contact person.

Data filing system

LAB University of Applied Sciences: Circular Ports Participant lists.
1.3.2025-29.2.2028.

Data controller

LAB University of Applied Sciences
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Address: Mukkulankatu 19, 15210 Lahti, Finland
Phone: +358 3 828 18
Email: helpdesk@lut.fi

Contact person

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Parties and division of duties in a collaborative project

Interreg Baltic Sea Region co-funded project Circular Ports -Deploying Circular Economy in Port Environments, is an international collaboration project implemented by Port of Hamburg Marketing (Germany), Port of Aalborg R&D (Denmark), Aalborg Municipality Climate Alliance (Denmark), Port of Tallinn (Estonia), Port of Norrköping (Sweden), City of Lappeenranta (Finland), Hamburg University of Technology (Germany), Hamburg Port Authority (Germany), LAB University of Applied Sciences (Finland), RISE Research Institutes of Sweden (Sweden), Baltic Ports Organisation (Estonia), Centrum Balticum Foundation (Finland), EMR European Metal Recycling (Germany), Metcom (Poland), University of Gdansk (Poland) and Enefit Green (Estonia). The Swedish National Road and Transport Research Institute (VTI) (Sweden),

LAB University of Applied Sciences participates as a project partner and contributes to the regional implementation of the Circular Ports activities in Finland, particularly through the development of digital tool and pilot actions supporting circular material flows in the Mustola port environment, Lappeenranta. All project partners are responsible for the implementation of regional pilot activities as well as participation in interregional cooperation to co-create circular economy models that can be replicated across the Baltic Sea Region.

Director in charge of the project

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Project executors

Project manager, RDI manager, financial manager and project experts.

LAB's data protection officer

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Data Protection Ombudsman in Finland

Webpage: <https://tietosuoja.fi/en/home>