

PRIVACY NOTICE

SustainaCycle

**EU's General Data Protection Regulation (2016/679),
Articles 13 and 14**

Date: 19/12/2025

Updated: 28/01/2026

Purpose of personal data processing

The data is collected and processed for the reporting, communication and publishing purposes of the Interreg Central Baltic project SustainaCycle. LAB University of Applied Sciences is the Partner of the project and responsible for the Work Package 1.

The SustainaCycle project aims to improve how plastic, textile and electronic waste materials are collected and reused, helping reduce waste and save natural resources. The project will pilot smart and mobile waste collection systems in Estonia, Finland, and Latvia, while mapping waste chains and connecting them to companies that can recycle or reuse materials. Awareness campaigns will help people understand how and why to sort waste better.

SustainaCycle will set up innovative demo sites in Estonia, Finland, and Latvia to collect up to 40,000 kg of plastic, textile, and electronic waste each year. The project aims to recover at least 60% of this waste through recycling and reuse, helping reduce the need for virgin materials. By connecting waste collectors with companies that handle recycling and material recovery, SustainaCycle promotes a more circular economy. It will also raise awareness in communities to support responsible waste disposal and encourage sustainable habits.

SustainaCycle promotes interregional cooperation and knowledge exchange on selected themes, by connecting waste collectors with companies that handle recycling and material recovery. This is achieved through collaborative meetings, workshops, discussions, site visits, and the exchange of good practices.

As part of the project SustainaCycle, LAB organises interregional and regional events as well as disseminates project news and results via project website and publications, for which the data is collected. In SustainaCycle 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 and Google Forms through project SustainaCycle homepage (<https://centralbaltic.eu/project/sustainacycle/> and <https://lab.fi/en/project/sustainacycle>) or LAB's project employers email.

Data transfer and disclosure

The data collected by Webropol and Google Forms 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 SustainaCycle, 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 may be transferred beyond the EU and EEA due to the use of service of Google Forms, which servers are located in United States. Google Forms is certified under the EU-US DPF agreement (EU-U.S. Data Privacy Framework) and GDPR compliant.

Security of the collected data

Personal access to the Webropol and Google Forms databases as well as to the back-up copies stored at LAB servers is provided only to project personnel of SustainaCycle 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 1.5.2025-30.4.2028.

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: SustainaCycle Participant lists.
1.5.2025-30.4.2028

Data controller

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

Contact person

Name: Maria Jäppinen, RDI Specialist, LAB University of Applied Sciences
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Parties and division of duties in a collaborative project

EU Interreg Central Baltic co-funded project SustainaCycle, is a cross-border cooperation project implemented by Viimsi Municipality Government (Estonia), LAB University of Applied Sciences (Finland), Valmiera Development Agency (Latvia), ZAAO Waste Management Company (Latvia), Estonian Circular Economy Industries Association (Estonia) and the Sustainability InnoCenter (Sweden). The project aims to improve the collection, reuse and recycling of plastic, textile and electronic waste in the Central Baltic region through smart and innovative waste collection solutions, waste chain mapping and public awareness activities. Viimsi Municipality acts as the Lead Partner, while LAB University of Applied Sciences is responsible for leading the waste chain mapping and modelling work package (WP 1) and contributes to the interregional cooperation and regional implementation of project activities in Finland. 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, RDI manager, financial manager and project experts.

LAB's data protection officer

Ilona Saarenpää, Legal Counsel
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Data Protection Ombudsman in Finland

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