

PRIVACY NOTICE

Know your partner procedures and sanctions screening

EU's General Data Protection Regulation (2016/679),

Articles 13 and 14

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1. Data controller

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2. Data controller's representative and contacts

Data controller's representative:

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Data controller's contact:

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3. Data protection officer

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4. Purpose of data processing

Personal data is processed to find out and know about the background of contracting partners and partners in cooperation for the purpose of risk assessment, and to ensure compliance with international sanctions and export control regulations.

5. Legal basis of data processing

The legal basis for the processing of personal data is compliance with a legal obligation of the controller to the extent that the obligation to comply with regulations on sanctions and export control is based on Finnish or EU legislation, in particular:

- Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items, and complementing national legislation
- the EU's international sanctions in force
- the Act on the Fulfilment of Certain Obligations of Finland as a Member of the United Nations and of the European Union (659/1967).

Data processing may also be based on the data controller's legitimate interest when it is not based on the data controller's legal obligations. A legitimate interest refers here to the data controller's need to identify and manage risks related to its partnerships and ensure that also other statutes concerning export control and international sanctions are observed (e.g. export control enactments of the United States or international sanctions imposed by the United States).

6. Personal data processed

The following data is processed about contracting or partner organisations and their representatives:

- Data on the company/organisation; official name, business ID, place of residence and address. The industry field and geographic operating area of the company/organisation. Does the company/organisation operate in a country subject to international sanctions (yes/no)? Does the export control of dual-use items apply to the activity of the company/organisation (yes/no)?
- Is the company/organisation part of a corporate group (yes/no). Data on the group: parent company, official names of the companies in the group, description of the group structure. Does any company in the group operate in a country subject to international sanctions (yes/no)? Does a company in the group conduct business subject to export control on dual-use items (yes/no)? Do international sanctions apply to any owners or people in decision-making bodies in the group (yes/no)?
- Ultimate beneficial owners and/or responsible persons of the company/organisation: name, date of birth, nationality, country of residence, ownership share or voting rights in the company or organisation. Role of beneficial owners in the company/organisation (owner, board member, CEO, other position in operational management). Do international sanctions apply to the beneficial owner (yes/no)?
- In addition, information may be collected from data subjects on whether they have politically influential or sanctioned persons in their immediate circle.

- Person who filled out the declaration: name, title, city and e-mail address. Affirmation of the correctness of the information.

Personal data related to sanctions screening is also processed of certain other categories of data subjects, such as job applicants, salary or fee recipients, grant recipients and visitors. Information provided by the data subjects themselves is processed about these persons, which is requested from them on a separate form. The form collects some basic personal data from the data subject (e.g. name, personal identity code, date of birth, citizenship, contact information) as well as their answers to questions about international sanctions.

If the data subject is subject to international sanctions, public data from the sanctions lists may also be processed.

7. Storage period

The data is stored in accordance with legislation in force and storage periods defined in the university's records management plan.

Data processed on contracting or partner organisations and their representatives will be stored for 10 years after the resolution of the case (e.g. termination of cooperation).

8. Information systems employed

The data is stored in information systems on servers maintained by the LUT University. An online file storage and the Excel and Dynasty systems are used in the data processing.

In addition, Webropol survey tool, e-mail and services provided by the Suomen Asiakastieto Oy and Dow Jones are used in the processing of personal data.

With regard to the personal data processed by HR Services, the HR system for payroll and HR management, the recruitment system and the case management system are used.

9. Data sources

The personal data is obtained from the companies, organisations and data subjects themselves and/or from Suomen Asiakastieto Oy and/or from Dow Jones. The data provided by the data subject may also include data concerning other data subjects. Information can also be obtained from public sanctions lists.

10. Use of cookies

Browser-based data filing systems employ cookies to process personal data. A cookie is a small text file that the browser saves on the user's device. Cookies are used to implement services, facilitate login, and enable the compilation of statistics on services. Users may prevent the use of cookies in their browser programmes, but this may prevent the system from operating correctly.

Cookies are used in data processing in browser-based systems.

11. Data transfer and disclosure

Data is transferred within the organisation to save electronic documents containing personal data from an online file storage to a document management system and otherwise to the extent required for the purpose of the data processing.

External service providers are used to process personal data. The service providers used include Suomen Asiakastieto Oy and Dow Jones. Personal data is transferred to external system suppliers and the personal data processors used by them when the systems of external service providers, such as the Webropol survey tool, HR system or recruitment system, are used in the processing of the data.

12. Data transfers beyond the EU or EEA

Personal data may be transferred outside the EU/EEA to Dow Jones (United Kingdom), in which case the transfer of personal data is based on adequacy decision by the Commission.

13. Safeguards for data processing

The LUT Universities' 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: users 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.

14. Automated decision-making

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

15. 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 protection 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). The right to erasure shall not apply if the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure prevents or significantly hinders the data processing
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20).
- f) The right of the data subject not to be subject to automated decision-making (article 21).

Data subject's rights under the EU's General Data Protection Regulation do not automatically apply to all data processing.

The liaison in matters related to the data subject's rights is the data protection officer; contact details in section 3.