

PRIVACY NOTICE

Timeless Talent – Ensure your Work Ability for a Better and Longer Career

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

Date of preparation: 1 September 2026

This privacy notice describes how the joint controllers identified below collect and process personal data in a joint filing system for the implementation of the **Timeless Talent – Ensure your Work Ability for a Better and Longer Career** project.

The project is implemented jointly by LAB University of Applied Sciences (lead partner) and the Estonian Chamber of Commerce and Industry (partner).

Name of the filing system

The personal data filing system of the **Timeless Talent – Ensure your Work Ability for a Better and Longer Career** project, maintained by the parties described above.

The project is co-funded by the European Union under Interreg Central Baltic.

Purposes and legal bases for processing personal data

The purpose of the **Timeless Talent – Ensure your Work Ability for a Better and Longer Career** project is to support ageing employees aged 50 and over in maintaining and improving their work ability and employability, to help extend working careers, and to promote well-being after retirement through a work ability development training programme implemented within the project. The participants are people aged over 50 working in the industrial, logistics and service sectors in Finland and Estonia. The training programme includes events, peer-support meetings, training sessions, workshops, webinars, visits, assessments, surveys and studies.

1. Events and meetings

During the project, webinars, workshops, training sessions, peer-support meetings and other events will be organised.

We collect and store information when individuals register for or participate in project events. The information is used to communicate about the training programme and to collect feedback.

The legal basis for processing is consent.

Anonymous participant feedback is also collected at project events. The feedback is used to evaluate the project and develop its activities.

The following personal data are collected in connection with events:

- First name and surname
- Email address
- Telephone number
- Company or other background organisation
- Special dietary requirements
- Communication consent and opt-out information

Participants will be informed upon arrival if photography or video recording takes place at a project event. Separate consent will be requested for the collection and storage, for project-related purposes, of photographs and video material in which an individual can be identified.

2. Communications

Current information about project events and activities is communicated to project participants and the project target groups. Personal data are collected directly from project participants, while contact information may also be obtained from publicly available sources, such as public websites. The legal basis for processing is the performance of a task carried out in the public interest.

The following personal data are collected for events and communications:

- First name and surname
- Email address
- Telephone number
- Company or other background organisation
- Communication consent and opt-out information

3. Assessments, surveys and studies

Electronic surveys and similar assessments carried out within the project collect comprehensive information related to an individual's work ability, including information on physical activity, lifestyle, workload, competence and work. The following background information is collected: company, position in the company, length of employment, educational background, gender and age. The legal basis for processing is consent.

Surveys, assessments and similar activities are carried out by experts from LAB University of Applied Sciences and the Estonian Chamber of Commerce and Industry.

4. Participation in the project training programme

The project implements a training programme related to the development of work ability. We collect and store information from individuals who register for the training programme. The information is used to implement the programme and provide related communications.

The legal basis for processing is consent.

The following personal data are collected from training programme participants:

- First name and surname
- Age
- Email address
- Home address
- Telephone number
- Company or other background organisation
- Special dietary requirements
- Communication consent and opt-out information

Sources of personal data

Personal data are collected directly from project participants. Contact information may also be obtained from publicly available sources, such as public websites.

Transfer and disclosure of data

Filing system data are transferred between LAB University of Applied Sciences and the Estonian Chamber of Commerce and Industry through a shared Teams channel. The Teams channel is used only by project personnel, and only project personnel have access to the personal data in the filing system.

In connection with project activities, personal data may be transferred to e.g. the following external processors:

- LAB uses the Webropol service for registrations for events and other activities, and for collecting feedback and conducting other surveys.
- Personal data, including names and contact details, and data obtained from surveys and assessments are updated and stored on LAB University of Applied Sciences devices and in software approved for data processing.
- The Howspace learning platform is used in the project training programme.
- Teams or Zoom may be used, as necessary, for training sessions or meetings organised within the project.

Transfers outside the EU or European Economic Area

As a rule, personal data is not transferred outside the European Economic Area. However, in connection with the use of external IT service providers, personal data may be transferred to the United States or other countries outside the European Economic Area where the service provider or the personal data processors used by it operate. In such cases, the transfer of personal data is based on adequacy decision by the Commission (including the EU-US Data Privacy Framework) or the Commission's Standard Contractual Clauses.

Secure storage of collected data

Digital materials are stored on secure servers of LAB University of Applied Sciences, and access is restricted to project personnel.

At the Estonian Chamber of Commerce and Industry, the materials and their backup copies are stored in locked premises and protected by firewalls, passwords and other technical safeguards. The materials may be accessed only by persons whose duties explicitly require such access.

Retention period

Data collected in the project will be retained for the duration of the project, from 1 April 2026 to 30 November 2028. Materials that must be archived, such as participant lists and other materials required by the funding authority, will be retained in the archives of LAB University of Applied Sciences and the Estonian Chamber of Commerce and Industry in accordance with the funding authority's instructions. Based on the individual's consent, data may be retained and used after the project has ended for possible research, development and teaching purposes; such data will not contain personal data.

If personal data have been disclosed, on the basis of separate consent given by the data subject, to the controllers' communications registers, the processing principles applicable to each controller's communications register will apply to those data.

Automated decision-making

No automated decision-making takes place when the data are processed.

Rights of the data subject

The data subject has the right to withdraw consent at any time where the processing of personal data is based on consent.

The data subject has the right to lodge a complaint with the Office of the Data Protection Ombudsman if they consider that the processing of their personal data infringes applicable data protection legislation.

Under the EU General Data Protection Regulation, the data subject has the following rights:

a) Right of access (Article 15)

You have the right to know whether your personal data are processed in the project and which of your personal data are processed. You may also request a copy of the personal data being processed.

b) Right to rectification (Article 16)

If the personal data being processed are inaccurate or incomplete, you have the right to request their rectification or completion.

c) Right to erasure (Article 17)

You have the right to request the erasure of your personal data in the following circumstances:

1. The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
2. You withdraw the consent on which the processing is based, and there is no other legal ground for the processing.
3. You object to the processing, as described below, and there are no overriding legitimate grounds for the processing.
4. The personal data have been unlawfully processed.
5. The personal data must be erased to comply with a legal obligation under Union or Member State law to which the controller is subject.

However, the right to erasure does not apply if erasure would prevent or seriously impair the achievement of the processing purpose in scientific research.

d) Right to restriction of processing (Article 18)

You have the right to obtain restriction of the processing of your personal data where one of the following applies:

1. You contest the accuracy of the personal data, in which case processing is restricted for a period enabling the controller to verify their accuracy.

2. The processing is unlawful and you oppose the erasure of the personal data and request restriction of their use instead.
3. The controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims.
4. You have objected to the processing, as described below, pending verification of whether the controller's legitimate grounds override your grounds.

e) Right to data portability (Article 20)

You have the right to receive the personal data that you have provided to the controller in a structured, commonly used and machine-readable format, and to transmit those data to another controller without hindrance from the controller, where the processing is based on consent or a contract and is carried out by automated means.

When exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

f) Right to object (Article 21)

You have the right to object to the processing of your personal data where the processing is based on the public interest or legitimate interests. In such a case, the controller may no longer process your personal data unless it demonstrates compelling legitimate grounds for the processing that override the data subject's interests, rights and freedoms, or unless the processing is necessary for the establishment, exercise or defence of legal claims. The controller may also continue to process your personal data where this is necessary for the performance of a task carried out in the public interest.

Right to object to direct marketing

Personal data will not be used for direct marketing unless the respondent has separately given permission for this purpose.

If the data subject has consented to the disclosure of their personal data to the controllers' marketing registers and later wishes to object to direct marketing, they must contact the joint controllers separately. The objection will be implemented in accordance with the privacy notices applicable to each controller's customer and marketing registers.

To exercise rights under data protection legislation, the data subject is requested to contact the Data Protection Officer whose contact details are provided later in this document.

Filing system details

Filing system: Timeless Talent – Ensure your Work Ability for a Better and Longer Career project filing system

Project duration: 1 April 2026 – 30 November 2028

A joint controllership agreement has been prepared for the project.

Joint controllers

LAB University of Applied Sciences Ltd	Estonian Chamber of Commerce and Industry
Business ID: 2630644-6	Business ID: 80004733
Yliopistonkatu 36 53850 Lappeenranta Finland	Toom-Kooli 17 10130 Tallinn, Harju County Estonia
+358 29 4465 000	+372 5300 5636

Contact persons

LAB University of Applied Sciences	Estonian Chamber of Commerce and Industry
Jaana Lerssi-Uskelin	Piret Potisepp
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+358 44 708 5233	+372 5300 5636
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Parties and division of responsibilities in the joint project

The parties to the project are LAB University of Applied Sciences and the Estonian Chamber of Commerce and Industry. The division of tasks and responsibilities between the parties is described in the partnership agreement and its annex.

Each party undertakes to carry out professionally and carefully the tasks, obligations and responsibilities assigned to it separately or jointly in the partnership agreement and its annexes.

Project personnel

LAB University of Applied Sciences

Project manager, experts, and possibly trainees and students participating in project implementation.

Estonian Chamber of Commerce and Industry

Project manager, experts, and experts procured from outside the organisation.

LAB Data Protection Officer

Legal Counsel Ilona Saarenpää
Lappeenranta-Lahti University of Technology LUT
Yliopistonkatu 34, 53850 Lappeenranta, Finland
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Person responsible for filing system matters at the Estonian Chamber of Commerce and Industry

Director of Services Piret Potisepp
Estonian Chamber of Commerce and Industry
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Email: Piret.Potisepp@koda.ee

Updates to this privacy notice

We may update this privacy notice when our activities or legislation change. We therefore ask you to review this notice from time to time.