

Privacy Notice for Associates

At Hanken, the protection of your personal data and privacy, as well as the responsible processing of your data, is of utmost priority.

This page describes the processing of associates' personal data. A general description of personal data processing at Hanken can be found <u>here</u>.

1. Data Controller and Contact Information

Data Controller: Hanken School of Economics (hereafter: Hanken)

Contact Information of the Data Controller: P.O. Box 479, 00101 Helsinki, Phone: +358 (0)29 431 331

Contact person for data processing inquiries: Jenny Elander, jenny.elander@hanken.fi Contact Information for DPO: dpo@hanken.fi

2. Why Does Hanken Process Your Personal Data?

Hanken processes your personal data for the following purposes:

- Management of contracts
- Payment of salaries, fees and reimbursements
- Statistical reporting and analysis
- Management of access rights

3. What is the Legal Basis for Hanken's Processing of Your Personal Data?

The processing of personal data for managing associate contracts and for the payment of fees and reimbursements is primarily based on Article 6.1(b) (performance of contract) of the GDPR.

Statistical reporting and management of access rights are based on Articles 6.1(f) (legitimate interest) and 6.1(e) (public interest and exercise of official authority) of the GDPR. In cases where processing is based on legitimate interest, Hanken carefully weighs the potential disadvantages to the data subject against the benefits to the data controller. In certain cases, the legal basis for processing may be Article 6.1(a) (consent) of the GDPR.

The processing of special categories of personal data is based on Articles 9.1(a) (consent) or 9.1(b) (the implementation of employment law provisions) of the GDPR.

4. What Personal Data is Collected and Processed at Hanken?

Hanken only processes personal data that is necessary for the specific purpose for which it is collected. The personal data collected includes:

- Identifying information (name, personal identity code or date of birth)
- Background information (e.g. educational background, nationality, native language, and residence permit details)
- Contact information (address, phone number, email address, and postal address)
- Purpose of the associate's contract and contact person at Hanken
- Start and end date of the contract
- Payment details, bank account number, fees, and grants*







• Information on individual arrangements *

Your personal data is only processed by individuals employed by Hanken or working on its behalf, who have the right to process the data. Only those for whom the processing is necessary for their work responsibilities will process the data.

5. How Does Hanken Collect Your Personal Data?

Data is collected from the following sources:

• Directly from you

6. To Whom May Hanken Disclose Your Personal Data?

Hanken may disclose your personal data to the following recipients when required:

Accounting and payroll service providers

7. Transfer of your Personal Data to Third Countries

Your personal data is not transferred to third countries outside the EU/EEA. Hanken regularly reviews its data transfer practices.

8. How Long Is Your Personal Data Stored?

The retention period for your personal data is determined according to applicable legislation and Hanken's information management plan. Data is retained only as long as necessary for the purpose for which it was collected or as required by national laws concerning publicity, information management, access to information, and archiving. For more detailed information, please contact the person mentioned above.

9. Your rights under the GDPR

9.1. Right of Access and Right to Rectification of Personal Data

In accordance with the GDPR, you have the right to know what personal data Hanken processes about you. You also have the right to have inaccurate personal data rectified, without undue delay. If your personal data is incomplete, you have the right to have data completed, with regards to the purpose of the processing.

9.2. Right to Erasure and Withdrawal of Consent

You have the right to request the erasure of your personal data if it is no longer needed for the purpose for which it was collected or processed. However, this right does not apply if the processing is necessary for:

- Compliance with a legal obligation,
- The performance of a task carried out in the public interest or in the exercise of official authority vested in the controller,
- The establishment, exercise, or defence of legal claims, or
- Exercising the right of freedom of expression and information.

^{*}May involve processing of special categories of personal data.

If the processing of your personal data is based on consent, you have the right to withdraw your consent. If there is no longer a legal basis for processing after withdrawal, your personal data will be deleted.

9.3. Right to Restriction of Processing

You have the right to request the restriction of the processing of your personal data in certain situations. This applies if:

- You contest the accuracy of the personal data during the period required to verify the data.
- The processing is unlawful, and you oppose the erasure of the personal data and instead request the restriction of its use, or
- Hanken no longer needs the personal data for the original purpose, but you need them to establish, exercise, or defend legal claims.

9.4. Right to Data Portability

You have the right to receive your personal data that you have provided to Hanken or to have your personal data transmitted to another controller in certain cases.

9.5. Right to Object to Processing

You have the right to object to the processing of your personal data if the processing is based on a public or legitimate interest.

9.6. Right Not to be Subject to Automated Decision-making

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

10. Exercising Your Rights

To exercise your rights under the GDPR, you may contact Hanken's Data Protection Officer by email at: dpo@hanken.fi.

If you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to file a complaint with the Office of the Data Protection Ombudsman.

11. Right to be Informed of a Personal Data Breach

If a personal data breach occurs that is likely to result in a high risk to your rights and freedoms, Hanken, as the data controller, is obliged to inform you of the incident without undue delay.