

DATA PROTECTION NOTIFICATION

At the Borders of Iron (IronNotes)

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

Articles 13 and 14

Date: 02/05/2025

Updated:

1. Data controller

LAB University of Applied Sciences

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2. Data controller's contact

Data controller's contact:

Name: RDI Specialist, Saija Malila

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3. Data protection officer

Name: Ilona Saarenpää, Legal Counsel

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4. Purpose of data processing

At the Borders of Iron (IronNotes) is a series of events and a network that gather together professionals, makers, students and wider audiences around the common theme of metal. Project seeks to find ways to strengthen the awareness of blacksmithing tradition, its possibilities to enhance regionality and co-operation between several countries. With different types of events the aim is to open the role of metal also to broader audiences with themes that link people with this special material culture.

The project will run from January 2025 to July 2027. The purpose of data collection and processing is for sharing information about the project and its results. The data primarily includes information about participants of the project events, project network and individuals subscribed to the project newsletter. The collected data is exclusively used for the IronNotes project

purposes. The email addresses will be used only for delivering the IronNotes newsletter, which will be issued twice a year (2025-2027) and for sharing project materials and information related to project events.

5. Legal basis of data processing

The data subject's consent and the performance of a contract.

Under the General Data Protection Regulation (GDPR), we are required to provide you with information regarding the legal basis for processing your personal data. The legal basis for processing your data in the context of the At the Borders of Iron project is as follows:

By subscribing to the At the Borders of Iron newsletter or participating in any of the project events, you provide explicit consent for the processing of your personal data for the stated purposes outlined in this Privacy Notice.

Our commitment is to ensure that the processing of your personal data is conducted lawfully, transparently, and in adherence to the principles outlined in the GDPR.

6. Content of data filing system and storage period

The storage periods are documented in the filing plan, which includes the organisation's operations and the documents generated in connection with them, including storage periods, which is during the project time (1.1.2025-31.7.2027).

Some of the data needs to be stored longer in case of funder's audit (5 years). According to Article 82 of the Common Provision Regulation (EU) 2021/1060, each partner institution is required to archive documents related to their project activities for at least a 5-year retention period from 31 December of the year in which the last payment by the managing authority to the project is made.

In case of the newsletter subscription, we use the Creamailer platform via <https://www.ironnotes.eu> -webpage (a public-access). We are gathering the following data on you: your name, e-mail address, country. The email address will be stored securely in compliance with the General Data Protection Regulation (GDPR) by LAB University of Applied Sciences (the coordinator of the At the Borders of Iron project) until the project is officially closed in 2027. In case of registration to the At the Borders of Iron events, we use the Webropol or Lyyti survey systems. We collect the following data on you: name, surname, email address, institution you represent, dietary restrictions. We also collect your signatures that we need to provide for reporting purposes to the funder. In case of interregional events, we may ask information about your planned arrival and departure, as well as the hotel you intend to stay. This is purely for organizing purposes by the event hosts.

During the online and in person events, we take pictures to be used in social media, project website and publications. We will ask your consent at the beginning of every event.

University's file storage is used for project's data handling and storing. For the contracts and agreements, university archive system, the Dynasty, is used.

7. Information systems employed

Webropol and Lyyti survey systems are used for event registration.

The Creamailer platform is used for the newsletter subscription. Subscription is possible via <https://www.ironnotes.eu> -webpage (a public-access).

University's file storage is used for project's data. For the agreements, university archive system, the Dynasty is used.

8. Data sources

Data is mainly collected from the data subjects themselves: Person who signs up for the project events, including the invited stakeholders, and a person who signs up for the project newsletter. On our website (www.ironnotes.eu), we use the open-source tool Matomo Analytics to analyze the browsing behavior of our users. Matomo processes visitors' IP addresses, but the installation is configured to anonymize IP addresses. This ensures that IP addresses are not identifiable personal data.

9. 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.

10. Data transfer and disclosure

Data is not transferred.

11. Data transfer and disclosure beyond the EU or EEA

Data is transferred from the data collector to an external data processors Webropol and Lyyti. In case of personal data will be transferred outside the EU or EEA fulfilling reliable mechanisms for personal data transfers (Data Privacy Framework (DPF) program). Otherwise, personal data will not be transferred outside of EU or EEA.

12. Safeguards for data processing

The collected and printed data is stored and safeguarded from external access in a locked cabinet, and only the project staff will have access to it. Printed documents are safely discarded when not anymore necessary. In addition, the data is processed on the university's secure servers and may only be accessed by the employees of the LAB Technology department.

Regarding the newsletter subscription, only the coordinating partner has access to the newsletter subscriber list in Creamailer.

Organizers of the project events have access to Webropol/Lyyti for participants registration.

13. Automated decision-making

No automated decision-making.

14. 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). 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) Right to object (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.