

## Privacy Notice for Research

In accordance with EU General Data Protection Regulation (2016/679, “GDPR”) and applicable national legislation (including Finnish Data Protection Act 1050/2018). Privacy notice is for purpose of informing the data subject about processing of personal data and his/ her data protection rights.

### 1. Name, duration and nature of the study

Name of the study/ research: ADMIRAL, Advanced multimodal marketplace for low emission and energy transportation / ADMIRAL Collaboration Forum

Duration of the study/ research: 1.5.2023 – 30.4.2026

Study/ research is:  cross-sectional  follow-up study

### 2. Controller(s), data protection officer(s) and contact person(s)

Name: VTT Technical Research Centre of Finland Ltd. (“VTT”), Business ID: 2647375-4

Address: Tekniikantie 21, 02150 Espoo, Finland

Contact information for data protection officer (DPO):

Address: VTT Technical Research Centre of Finland Ltd., Register Office,  
P.O. Box 1000, FI-02044 VTT, Finland

E-mail: [dataprotection@vtt.fi](mailto:dataprotection@vtt.fi) (DPO, data security and their substitutes)

Contact person or responsible research group of the study:

Name: Harri Pyykkö

Address: Tekniikantie 21, 02150 Espoo, Finland

E-mail: [harri.pyykko@vtt.fi](mailto:harri.pyykko@vtt.fi)

Name: UNIVERSIDAD POLITECNICA DE MADRID (“UPM”), Business ID: Q2818015F

Address: AVDA. DE RAMIRO DE MAEZTU, 7 28040 MADRID

Contact information for data protection officer (DPO):

Address: UNIDAD DE PROTECCIÓN DE DATOS UPM. AVDA. DE RAMIRO DE MAEZTU,  
7 28040 MADRID

E-mail: [proteccion.datos@upm.es](mailto:proteccion.datos@upm.es)

Contact person or responsible research group of the study:

Name: JOSÉ MANUEL VASSALLO MAGRO

Address: E.T.S.I. CAMINOS, CANALES Y PUERTOS. CALLE PROFESOR ARANGUREN, 3,  
28040, MADRID

E-mail: [josemanuel.vasallo@upm.es](mailto:josemanuel.vasallo@upm.es)

List of the other ADMIRAL project participants (“ADMIRAL project participants”) that have the access to the personal data:

TEKNOLOGIAN TUTKIMUSKESKUS VTT OY

UNIVERSIDAD POLITECNICA DE MADRID

AWAKE.AI OY

LABORATORIO NACIONAL DE ENGENHARIA CIVIL

UNIVERZA V LJUBLJANI  
STEINBEIS INNOVATION GGMBH  
TRANSPORTO INOVACIJU ASOCIACIJA  
STEVECO OY  
ETHNIKO KENTRO EREVNAS KAI TECHNOLOGIKIS ANAPTYXIS  
CTLUP SRL  
POSTA SLOVENIJE DOO  
UAB NORMALIS TECH  
SOLVESALL INTELIGENTNE RESTIVE DOO  
TREVIO UAB  
UAB CARGOGO LOGISTICS  
CARGO SIGN, UAB  
LOCODELS DOO  
HP HRVATSKA POSTA DD  
MARLOCONSULT LDA  
BTL GROUP UAB  
APS - ADMINISTRACAO DOS PORTOS DE SINES E DO ALGARVE, S.A.  
UAB KLAIPEDOS LAISVOSIOS EKONOMINES ZONOS VALDYMO BENDROVE

### 3. Joint controller responsibilities

UPM is responsible for collecting and storing the personal data as stated in this privacy notice.

VTT provides Microsoft Teams environment for storing and sharing the personal data for ADMIRAL project participants.

ADMIRAL project participants have access to the personal data.

The registered person can exercise her/his rights regarding the processing of personal data centrally through the contact person identified in section 2 (VTT or UPM). If necessary, the contact person delivers the registered contact to other joint controllers.

### 4. Personal data categories

Processed personal data categories: ADMIRAL Collaboration Forum contact person information: name, organisation, country and email.

### 5. Purpose and legal basis of processing

Purpose of personal data processing: The data subjects represent stakeholders of the "ADMIRAL Stakeholder Collaboration Forum". Forum informs stakeholders about all project developments and facilitates collaboration on ADMIRAL activities, such as validation of pilots, surveys, workshops, market acceptance, etc.

Legal basis of processing<sup>1</sup>:

- Performance of a task carried out in the public interest, scientific or historical research purposes or statistical purposes, archiving purposes of research data and cultural heritage data (when processing after the study/ research)
- Legitimate interests pursued by the Controller(s) or by a third party

legitimate interest concerned: [Describe the legitimate interest].

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<sup>1</sup> GDPR Art. 6 and Finnish Data Protection Act 4 §.

- Data subject's consent  
 Other: [Describe other legal basis compliant with applicable legislation].

Legal basis of processing special categories of personal data and personal data relating to criminal convictions or offences, set forth in Section 4<sup>2</sup>:

- Data subject's explicit consent  
 Processing relates to personal data which are manifestly made public by the data subject  
 Scientific or historical research purposes or statistical purposes under legislative safeguard measures<sup>3</sup>

## 6. Data sources

Personal data is received / collected from the ADMIRAL Collaboration Forum stakeholder persons using contact form.

## 7. Recipients or categories of recipients

Personal data is provided to: Personal data will not be disclosed outside of the controllers and ADMIRAL project participants.

Personal data will be stored into VTT administrated Microsoft Teams environment (ADMIRAL project Teams).

## 8. Transfers outside the European Union or the European Economic Area

Personal data is transferred outside the European Union or the European Economic Area (noting i.a. location of servers and other access rights of service providers):

- No  
 Not yet known but possible. Mechanism defined and informed on a case-by-case basis.  
 Yes, on the following basis:  
 Commission adequacy decision  
 Binding corporate rules  
 Commission standard data protection clauses  
 Other: [Describe other legal basis compliant with applicable legislation.]

The data will be stored on servers located in the EU/EEA area, using Microsoft TEAMS service. More information and terms and conditions of this service:

- <https://docs.microsoft.com/en-us/compliance/regulatory/gdpr>
- <https://www.microsoft.com/licensing/docs>

## 9. Automated decision making

No automated decision making occurs in the research.

## 10. Retention period of personal data after the research

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<sup>2</sup> GDPR Art. 9 and Art. 10. Finnish Data Protection Act 6 and 7 §.

<sup>3</sup> GDPR Art. 9(2)(j) and Art. 89(1) and Finnish Data Protection Act 31 §.

- Research data and personal data is destroyed after the research.
- After the research, research data is retained for [insert a retention period or describe criteria for determining said period] and
- personal data is anonymised
  - personal data is pseudonymised [fill in to section 5 archiving]
  - it contains direct identifiers of the data subject, for the following reason: [Describe why identifiers are retained and fill in to section 5 archiving.]

## 11. Protection principles

In performance of research, research data:

- is anonymized before commencing the research
- is pseudonymised before commencing the research
- contains direct identifiers of the data subjects

Personal data processed in data systems is protected with:

- username
- password
- multi-factor authentication (MFA)
- access control with IP address
- user monitoring (log)
- access control

Encryption method of data transmission:

- in transmission: [Describe]
- for data file: [Describe]
- other, what: [Describe]

## 12. Rights of the data subjects

The data subjects have the rights listed below, which however may be exempted from and/or not applied on grounds set forth in applicable legislation. Exemptions and restrictions are considered for each case separately.

The data subject can exercise these rights by contacting Controller with information set forth in section 2, preferably by email.

- Right to withdraw consent (and right to erasure)
- Right of access
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing
- Right to data portability
- Right to lodge a complaint with a supervisory authority

### **Further description of data subject’s rights:**

#### **Right to withdraw consent**

If the processing is based on consent, the data subjects have the right to withdraw their consent on which the processing is based on. This shall not affect the lawfulness of processing based on consent before its withdrawal.

#### **Right of access**

The data subjects have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed and access to his or her personal data and information concerning the processing of his or her personal data.

#### **Right to rectification**

The data subjects have the right to obtain from the controller rectification of inaccurate personal data concerning him or her. The data subjects have the right to have incomplete personal data completed.

#### **Right to erasure (“right to be forgotten”)**

The data subjects have the right to obtain from the controller the erasure of personal data concerning him or her.

#### **Right to restriction of processing**

The data subjects have the right to obtain from the controller restriction of processing.

#### **Right to data portability**

Where the processing is based on the data subject’s consent and carried out by automated means, the data subjects have the right to receive the personal data concerning him or her, which he or she has provided to the Controller and have the right to transmit those data to another controller.

#### **Right to lodge a complaint with a supervisory authority**

The data subjects have a right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data breaches the data subject’s rights pursuant to applicable law. In Finland, see Finnish Data Protection Ombudsman contact information:

<https://tietosuoja.fi/en/contact-information>