

# Privacy notice for SOCRATES project website

The privacy notice is based on the EU's General Data Protection Regulation (2016/679, "GDPR") and Finnish Data Protection Act (1050/2018). Version [7.5.2026/1]. The privacy notice can be updated. The data subject can review the up-to-date content by regularly visiting the SOCRATES project website.

## 1. Name of the purpose of processing

SOCRATES policies and procedures on the collection, use and disclosure of personal data when using the website.

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

VTT Technical Research Centre of Finland Ltd ("VTT"), business ID: 2647375-4, Tekniikantie 21, 02150 Espoo.

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 details of the contact person:

Name: Teemu Kärkelä

Address: VTT Technical Research Centre of Finland Ltd., Kivimiehentie 3, P.O.Box 1000, 02044 VTT. Finland.

E-mail: [socrates.eu@vtt.fi](mailto:socrates.eu@vtt.fi)

## 3. Personal data to be processed

The personal data to be processed are: Email address, first name and last name and website usage data collected through cookies and other tracking technologies.

There is a separate cookie notice and selection on the website.

The data subjects represent the following groups: A person visiting SOCRATES website

## 4. Purpose of processing and legal basis

The purpose of usage data is to assess content usage and to compile statistics about the use of website in order to improve the user experience.

Legal basis for the processing of personal data <sup>1</sup>:

- Legitimate interest pursued by the controller or by a third party (Article 6(f) of the GDPR) to maintain and develop the website
- Consent of the data subject for the purpose of responding to requests and sending newsletters (Article 6(a) of the GDPR)

## 5. Data sources

Personal data are obtained from the data subject through the website contact form, newsletter subscription form and cookies.

---

<sup>1</sup> GDPR Article 6 and Section 4 of the Data Protection Act.

<sup>2</sup> Article 11 of the GDPR

## 6. Recipients or categories of recipients of personal data

**Name and contact details of the recipient/  
Type of recipient** (if there is a justifiable reason not to specify)

**Purpose of the disclosure, role of the recipient in the processing**

VTT coordinator

Responding to the inquiries of people contacting through the website

VTT coordinator

Collecting email of newsletter subscribers and sending out the newsletters to them

VTT may from time to time change the service providers used in the processing of personal data, for example in connection with public procurement. These will be notified by updating the privacy notice.

## 7. Transfer of personal data outside the EU or the EEA

No

## 8. Storage period of personal data

The data are processed for a maximum of 4 years after the collection of data until the project ends in 2028. After that, the data will then be removed or anonymised.

## 9. Principles of personal data protection

Protection of personal data processed in an **information system**:

- User ID
- Password

## 10. Rights of the data subject

The data subject has the following rights, however, which may be derogated from and/or restricted in accordance with applicable legislation. Please note that in case the controller cannot identify the data subject, certain rights of the data subjects may not apply, unless the data subject provides additional information enabling his or her identification<sup>2</sup>. Restriction and deviation are verified on a case-by-case basis.

**The data subject may exercise the above rights by contacting the controller using the contact details specified in item 2, preferably by e-mail.**

- right to withdraw consent (and right to erase data)
- right of access
- right to rectification
- right to erasure (so-called "right to be forgotten")
- right to restrict the processing of data
- right to data portability
- right to lodge a complaint with a supervisory authority

---

<sup>1</sup> GDPR Article 6 and Section 4 of the Data Protection Act.

<sup>2</sup> Article 11 of the GDPR

## **Further information on the data subject's rights:**

### **Right to withdraw consent**

If the processing is based on consent, the data subject has the right to withdraw their consent at any time regarding the processing of their personal data.

### **The data subject's right to access data**

The data subject has the right to obtain confirmation from the controller as to whether personal data concerning them are processed. In addition, the data subject has the right to access his or hers personal data and information on the processing of personal data.

### **Right to rectification**

The data subject has the right to have inaccurate and incorrect personal data concerning the data subject rectified and incomplete personal data completed without undue delay.

### **Right to erasure, so-called "right to be forgotten"**

The data subject has the right to have the controller erase personal data concerning the data subject without undue delay.

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

In certain situations, the data subject has the right to demand that the controller restrict the processing.

### **Right to object to the processing**

In certain situations, the data subject has the right to object to the processing of personal data concerning them.

### **Right to portability**

The data subject has the right to receive personal data concerning them that they have provided to the controller and the right to transmit those data to another controller in so far as the processing is based on consent or contract and the processing is carried out automatically.

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

The data subject has the right to lodge a complaint with supervisory authorities if the data subject considers that their rights have been violated in the light of the EU General Data Protection Regulation. Contact details of Finnish Data Protection Ombudsman:

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

## **Cookie Policy**

### **Cookie data collected**

The website uses only strictly necessary (technical) cookies required for the basic functioning of the site (e.g., session management, form operations). These cookies are not used to identify individuals.

Visitor tracking on the site is carried out anonymously so that no personal data or IP addresses are collected. Analytics are aggregated and anonymous.

---

<sup>1</sup> GDPR Article 6 and Section 4 of the Data Protection Act.

<sup>2</sup> Article 11 of the GDPR

## **Cookies**

- Only strictly necessary cookies are used.
- Cookies are not used to identify individual visitors or to link data to personal information.
- PHP: We use PHP for website development. It places functional cookies (exp\*) to provide functions across pages. This data is not shared with third parties.
- WordPress: We use WordPress for website development. It places a session cookie (wpEmojiSettingsSupports) to store browser details. This data is not shared with third parties.
- Cookie management: you can disable or delete cookies via your browser settings; however, some site functions may not work properly if cookies are disabled.

## **Third-party links and cookies**

The site may contain links to external websites. When you follow links to other sites, socrates-auratom.eu is not responsible for cookies or privacy practices of those third-party sites. Please review the privacy notices of those external sites.

---

<sup>1</sup> GDPR Article 6 and Section 4 of the Data Protection Act.

<sup>2</sup> Article 11 of the GDPR