



Privacy notice: MilVerse4MDO - Military Metaverse for Multi-Domain Operations

This is a privacy notice, which is based on articles 13 and 14 of the EU's General Data Protection Regulation.

Data Controller

Turku University of Applied Sciences Ltd

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20520 Turku, Finland

Telephone exchange +358 (0) 2 263 350

kirjaamo@turkuamk.fi

Person in charge and contact persons

Timo Haavisto, Senior Advisor, timo.haavisto@turkuamk.fi

Anni Paloposki, Administrative project manager, anni.paloposki@turkuamk.fi

Contact information of the Data Protection Officer

Harri Kilpiö, Data Protection Officer (Turku UAS),

telephone number

Please contact in all data protection related matters: tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing the personal data

Personal data is collected and processed for the implementation of the MilVerse4MDO – Military Metaverse for Multi-Domain Operations project of



Turku University of Applied Sciences Ltd. The project will be carried out between 1 April 2026 and 31 March 2029.

Personal data is collected and processed for the following purposes:

1. To plan and organize project events and activities, ensure their security, communicate and market the events and activities, and collect feedback from participants.
2. To create and maintain a contact list for stakeholder communications related to project implementation, to support the planning of potential follow-up projects, and to provide information about the project's events, results, and subsequent actions.
3. To report on the implementation and results of the project to the funding body and to enable project monitoring, auditing, and inspection activities.

Legal basis for processing personal data

Legal basis for the processing of personal data is the consent of the data subjects, performance of a task carried out in the public interest or in the exercise of official authority, and compliance with a legal obligation to which the controller is subject.

Processed categories and storage times of personal data

The categories of personal data processed include information relating to representatives of companies, research organizations, public authorities, stakeholders, and target groups participating in the project activities.

1. For the organization of events and activities: Name, contact details, job title, company or organization name, and photographs (portrait photographs are processed based on the individual's consent). In addition, general photographs may be taken at project events and activities for communication, marketing, and documentation purposes. In such
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photographs, no individual person is the primary subject of the image. Any special categories of personal data (e.g., food allergies) may be processed solely for the practical organization of events and only with the data subject's consent. Personal data will be retained for the duration of the project.

2. For creating a contact list: Name, contact details, job title, and information relating to the company or organization. Personal data will be retained for two (2) years after the end of the project.
3. For reporting project implementation and results to the funding authority, and for project monitoring and audit purposes: Information on event and activity participants (name, company, job title), expense and payment receipts, procurement documents, working time records with approval signatures (name, company, job title), and payroll information (name, company, job title, salary information). Project documents and any other material required for project monitoring and audits will be retained in accordance with the funding authority's regulations for at least ten (10) years following the final payment of the project.

Contact person after the end of the project:

Anni Paloposki

anni.paloposki@turkuamk.fi



Regular information sources

The data is primarily obtained from the data subjects themselves. In addition, the information is also sourced from websites and other public sources of information.

Receivers or receiver groups of personal data

Personal data is received by the staff of Turku University of Applied Sciences for the performance of tasks related to the project. Project-related personal data may be disclosed to the funding body to enable monitoring of the project's progress and compliance with the funding conditions. Project-related personal data may also be disclosed to inspectors and auditors to allow them to review documentation concerning the project's progress and to oversee proper financial administration.

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

The data is not transferred to third countries.

Principles of data protection

The data is accessed only by people whose tasks require access to the data. Access to the service is limited with user IDs and user rights.

The data is stored in information systems approved by Turku University of Applied Sciences.

Data subjects' rights

According to the General Data Protection Regulation, the data subject has the right:

- to receive information on the processing of their personal data, unless otherwise regulated by the law
 - to request for access to their personal data and rectification regarding incorrect or insufficient information
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- to erase their data (not applied, if the basis for processing is compliance with a legal obligation or performance of a task carried out in the public interest)
 - to restrict the processing of their data
 - to object to the processing of their data, if the basis for processing is general or legitimate interest
 - to request the transfer of data they have submitted themselves from one controller to another, if the basis for processing is consent or agreement
 - withdraw the consent they have given
 - notification obligation of the controller on the rectification/erasure/restricting of processing of personal data
 - not to be subject to automated decision-making (the data subject may allow automated decision-making by their consent)

Data subjects may exercise their rights by contacting the contact person mentioned in the privacy notice or the Data Protection Officer. More information on data subjects' rights is provided by the contact person and/or Data Protection Officer.

If processing the data does not require identifying the data subject without additional information or the controller cannot recognize the data subject, the right to inspection, rectification, data erasure, restriction of processing, obligation to report and transmittal is not applied.

You have the right to file a complaint with the Data Protection Ombudsman's office, if you consider that valid data protection legislation has been breached in processing your personal data. The contact details of the DPO can be found in the beginning of the privacy notice. All requests are processed on a case-by-case basis.
