

Privacy Notice for Photography

Promoting circularity and sustainability for the construction and real estate sector (CircBuild) Project

This file is a translation of the [Finnish original](#) which should be consulted in cases of uncertainty.

With this privacy notice, we provide you the information required by data protection legislation on how we process your personal data in connection with photography. A description of the project and related activities can be found in [the information sheet](#) for the processing of personal data in the Promoting circularity and sustainability for the construction and real estate sector (CircBuild) project.

In data protection legislation, the term “data subject” refers to the person to whom the personal data relates. In this privacy notice, we refer to the data subject using the form “you” and to the data controller using the form “we.”

This data protection notice may be updated or amended if necessary. If the change is significant, we will inform you in accordance with the requirements of the legislation.

This privacy notice has entered into force on 23 October 2025.

1. Data Controller

The controllers of the project are multiple organizations. The project is carried out as a joint project of the data controllers, in which several parties jointly determine the purposes and means of processing personal data.

Tampere University Foundation sr (Tampere University)
2844561-8
Kalevantie 4, 33100 TAMPERE

Häme University of Applied Sciences Ltd
2617489-3
P.O. Box 230, 13101 HÄMEENLINNA

The contact person for matters concerning the processing of personal data is Jaakko Kinnunen, Project Manager, who can be reached at jaakko.kinnunen@tuni.fi, +358504377144. The university switchboard is available at +358 (0) 294 52 11.

For general questions related to data protection, you can contact the Data Protection Officer at dpo@tuni.fi (Tampere University) or tietosuojaava@hamk.fi (Häme University of Applied Sciences).

2. Purpose and scope of processing

Your personal data is processed as part of the active communication of the CircBuild project, for example on our websites and on social media (LinkedIn, X, Instagram), as part of developing our activities and our aim to make our project accessible to a wide audience. In this context, when you register for events and occasions, we ask for your consent to take photographs and to publish them on our communication channels. The photos are used as communication material for the project and to support reporting.

During the project, data is processed within the research group consisting of individuals working in the CircBuild project. We collect the data directly from the data subjects themselves and use commonly applied services of higher education institutions for processing, such as Microsoft applications (Word, Excel, Teams, OneDrive, Outlook), for which the institutions have appropriate agreements in place. The project is funded by the European Regional Development Fund (ERDF), and reporting is carried out in accordance with the funder's guidelines in the EURA2021 system. Communication activities carried out during the project are also reported in this system.

The responsible leader of the research and the project (Project Manager Jaakko Kinnunen) is responsible for the implementation of the project. Members of the project group participate in carrying out the research and the project.

Further information on how we collect and use your data is available in the information sheet (link available on our website: <https://projects.tuni.fi/circbuild-en/>).

3. Legal basis for processing

The legal basis for processing your personal data in photography is consent.

4. Sources of personal data and data processed

We collect the following specified data from you as a data subject. No other data is intentionally collected in relation to photography (see more in the CircBuild events privacy notice and the CircBuild research privacy notice).

Personal data is collected from you as a data subject as part of the event.

We process the following categories of personal data:

- General personal data: data resulting from the recording of the event (photographs).

5. Transfers and disclosure of personal data

Your personal data is transferred outside the EU/EEA as follows: we publish photographs on our social media channels (LinkedIn, X, Instagram), which are globally accessible, and on our websites, which are maintained by the higher education institutions. The transfer mechanism and safeguards are as follows: photographs and videos are stored on personal devices protected by the information security measures of the higher education institutions. The images are uploaded from the device to social media services and to the website.

In addition, photographs are used as part of reporting to the project funder by submitting them as part of the communication report in [the EURA2021](#) (the file in the link is only in Finnish and Swedish) system.

The platforms used for processing photographs include [Microsoft](#), our social media channels ([LinkedIn](#), [X](#), [Instagram](#)), and [Adobe](#) (for video editing and adding logos to images). You can find out how these different parties process personal data in their respective privacy notices (links provided alongside their names).

6. Protection of personal data

Your personal data is protected using appropriate technical and organizational measures. We protect your data technically, for example, through antivirus protection, firewalls, and by ensuring regular software updates. In addition, we require a password and username for login, as well as two-factor authentication where applicable.

We also protect your data through organizational measures. Our staff are bound by confidentiality obligations, and access to data is restricted internally. Where necessary, we also implement additional specific safeguards, such as separate storage locations.

Photographs are stored with direct identifiers, as they constitute visual personal data. No additional identifiers are attached to the stored images. Only published images may include additional identifiers alongside the photograph. These are described in [the information sheet for the processing of personal data](#) in the Promoting circularity and sustainability for the construction and real estate sector (CircBuild) project and in [the privacy notice for events](#).

Transfers of data outside the EU/EEA are based on the European Commission's Standard Contractual Clauses (SCC) and/or the EU–US Data Privacy Framework used by service providers.

7. Retention period of personal data

Your personal data will be retained for a period considered necessary on a case-by-case basis. The retention period is also affected by legal requirements. We comply with our records management plan (RMP) and applicable legislation in the retention of personal data.

According to the EURA system's records management plan of the funder, all documents generated by the system are retained for at least 20 years after the closure of the project. Decisions generated by the system, requests for rectification, final project reports, documents related to project audits, and payment requests to the Commission are stored permanently.

Photographs containing individuals that are stored elsewhere than on the personal devices of the project staff will be deleted no later than fifteen years after the end of the project (they are retained for reporting purposes). Project staff have the right under Finnish legislation to retain photographs for personal use.

After the retention period has ended, photographs containing personal data may still remain on social media platforms and the CircBuild website.

8. Profiling and automated decision-making

Your personal data will not be used for profiling or automated decision-making.

9. Data protection rights and how to exercise them

Data protection legislation grants you, as a data subject, certain rights. These rights depend in part on the legal basis for processing personal data. In certain cases, your rights may be restricted, for example due to a legal obligation or if the processing is carried out for scientific research, statistical purposes, or archiving. If your rights are restricted, we will implement the appropriate and necessary safeguards required by legislation. You have the following data protection rights, which you can exercise by submitting a relevant request.

Right of access

You have the right to obtain information about the processing of your personal data and to access the personal data concerning you.

Right to rectification

You have the right to request the correction of inaccurate and incomplete personal data. In addition, you have the right to request the deletion of unnecessary personal data.

Right to erasure

In certain situations, you have the right to request the deletion of your personal data (the "right to be forgotten").

Right to restriction of processing

In certain cases defined by law, you may have the right to restrict the processing of your personal data. This right may apply, for example, if you believe that the personal data concerning you is inaccurate, is being processed unlawfully, or if you have objected to the processing of your data.

Right to object

In certain situations, you have the right to object to the processing of your personal data based on your particular personal situation.

Right to data portability

In certain situations, you have the right to request the transfer of personal data you have provided from one system to another.

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, such as profiling, which produces legal effects concerning you or similarly significantly affects you. However, there are exceptions to this right.

Withdrawal of consent

If the processing of your personal data is based on consent, you have the right to withdraw your consent at any time.

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority (the Data Protection Ombudsman) if you believe that the processing of your personal data violates data protection legislation.

Office of the Data Protection Ombudsman

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Postal address: P.O. Box 800, 00531 Helsinki

Telephone (switchboard): +358 29 56 66700

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