

Table of Contents

INTERACT GIS declaration regarding the processing of personal data	1
Controller, processor and sub-processor	1
Purpose of the processing of personal data	2
Legal basis for the processing of personal data	2
Processing of personal data	2
Disclosure of personal data	3
Storage of personal data	4
Rights regarding the processing of personal data	5
Complaints regarding the processing of personal data	5

INTERACT GIS declaration regarding the processing of personal data

Controller, processor and sub-processor

In collaboration with INTERACT (www.eu-interact.org) and SITES (www.fieldsites.se), an information system called INTERACT GIS has been developed and made available for usage at INTERACT and SITES field stations. A central aspect of INTERACT GIS involves collecting and storing personal data that falls within the framework of the European Parliament’s General Data Protection Regulation, GDPR. Such collection and storage require a controller, which according to the GDPR is “the legal person that processes personal data within its business”. As INTERACT GIS offers support to the field stations’ own operations, each station that uses the system is therefore to be considered a *controller*.

In the event that the controller’s organisation engages an external resource to process personal data, this resource is called a “*processor*”. In the case of INTERACT GIS, it is the Swedish University of Agricultural Science, SLU, that is responsible for the processing of personal data on behalf of the field stations until further notice.

According to direct requirements of the GDPR, the relationship between a controller and processor must be regulated in a written Data Processing Agreement (DPA) wherein the processor’s responsibilities are clarified:

- The processor assumes responsibility for ensuring an adequate level of security in terms of aspects such as technical and organisational security, data availability, authorisation, etc.
- The processor assumes responsibility for immediately notifying the controller of any breaches, incidents, or doubts regarding the application of the Personal Data Act.

SLU’s contact person regarding the processing of personal data can be reached at matts.djos@slu.se, and the Data Protection Officer at SLU is reached at dataskydd@slu.se or +46 (0)18-67 20 90.

In its role as processor, SLU delegates the responsibility for operation and service of INTERACT GIS to its sub-processor “ICT Services and System Development” at Umeå University Sweden, UmU ITS.

Purpose of the processing of personal data

At the overall level, INTERACT GIS collects, stores, and disseminates information, including personal data, in order to promote and disseminate knowledge regarding the circumpolar research and environmental monitoring that is conducted at Northern field stations. Personal data is not disseminated publicly in any way other than via publications referred to by accessible information, while logged-in users can view personal data also in other ways.

On a more specific level, INTERACT GIS collects, stores and disseminates personal data in order to:

- ~ Preserve the knowledge of the activities that have taken place at Northern field stations.
- ~ Enable historical research concerning the activities that have taken place at Northern field stations.
- ~ Provide information regarding the activities that have taken place at Northern field stations.
- ~ Provide georeferenced publication databases.
- ~ Enable searches of the data produced in the activities performed at Northern field stations.
- ~ Enable contact between those who have engaged in activities at Northern field stations.
- ~ Administrate and plan activities at Northern field stations.
- ~ Create a basis for operational analyses and reports at Northern field stations.

Activities at a Northern field station normally includes research, environmental monitoring, teaching and/or conference activities.

Legal basis for the processing of personal data

INTERACT GIS web applications are provided free of cost to the public, but at cost price for the field stations using it for active administration. In order to access functionalities for the administration of field stations, the public user must apply for a user account that is subject to the DPA established between SLU and each of the active user stations, where SLU processes personal data in the way required to fulfil the DPA.

Through the DPA, the controller Field Station agrees to process the personal data as required to comply with the requirements imposed by the respective authorities' handling and archiving of public documents. The term "respective authorities" refers to the authorities of the nation where the Field Station is located, where nations with the EU essentially share these requirements. Within the EU, handling and archiving of public documents is considered to be a task in the *public interest*. Therefore, the information management carried out via INTERACT GIS is considered to be in the *public interest*, which has an decisive impact on how the processing of personal data has been implemented in INTERACT GIS.

Processing of personal data

INTERACT GIS is used as support in the administration of visitors at Northern field stations, and for the collection, storage and public sharing of information concerning activities at the field stations. As an example, each conference participant is named in conjunction with booking of accommodation at field stations, as is each participant in research activities. Personal data concerning conference participants is anonymised after a certain period of time, while there is significant public interest in the long-term storage of personal data concerning research leaders and staff.

The latter type of information is managed internally at the stations where the activity has taken place (an activity can take place at several stations), where it can, for example, be included as a basis for annual reports and similar documentation submitted to the principals of the field stations, while the activity information related to the personal data is publicly distributed in an anonymised format. This

means that the personal data that account holders themselves have chosen to make visible is accessible to system administrators and certain station administrators, while public users never have access to personal data.

Activity managers and staff can at any time have their personal data pseudonymised on all authorisation level apart from the system level (it is the system administrator who stores the pseudonymisation key), but never anonymised or deleted as this contradicts the basic intentions of the public utility system.

INTERACT GIS contains the authorisation levels System Administrator, Station Administrator, Activity Manager, and Public:

- **System administrator**

- Adds stations and organisations to the system.

- Distributes accounts to station administrators.

- Administers personal data, anonymisation, and pseudonymisation keys across the entire network of connected stations.

- **Station administrator**

- Distributes accounts to activity managers, i.e. to those applying to conduct an activity at the station.

- Administers personal data associated with their own station.

- **Activity manager**

- Applies to conduct an activity at one or several stations.

- Reads and edits their own register of completed and current projects, including personal data regarding all associates and employees. Personal data is stored until further notice.

- With teaching or conference activities, course and conference participants are automatically anonymised after five years, while activity managers, their associates and employees, figure with personal data until further notice.

- May upon request have their own, their associates, and their employees' personal data pseudonymised at all authorisation levels apart from the system level. Act as representative for their associates and employees in this matter.

- **Public users**

- Can search and filter pseudonymised activity data, and thus never access direct personal data.

As INTERACT GIS is used internationally, personal data may be transferred internationally, including outside the EU.

Data regarding the use of INTERACT GIS, including personal data, is transmitted to Google Analytics and stored there for the shortest possible time before being automatically deleted.

Disclosure of personal data

SLU may disclose the personal data stored in INTERACT GIS to those who request it together with a public document, in accordance with Swedish legislation regarding public documents, as long as the personal data is not subject to confidentiality.

Storage of personal data

The following direct and indirect personal data is collected and stored in INTERACT GIS:

- **System level**
Personal identity, station identity
- **Register of persons**
Personal identity, name, nationality, academic title, profession, institution, address, phone number, e-mail address, date of birth, user name, password, display name, last login date, administrator's comments.
- **Station level**
Station identity, administrator identity, e-mail address.
- **Activity role**
Personal identity, activity identity, administrator's notes.
- **Activity application**
Application identity, activity identity, name, nationality, academic title, date of birth, e-mail address, institution, institution address, profession, phone number, comment made in the application, administrator's notes, type of invoicing.
- **Reservation for accommodation**
Application identity, reservation identity, activity role (manager, associate, employee, or participant), name, gender, age, nationality, e-mail address, academic title, institution, arrival date, checkout date, special requirements, administrator's notes.
- **Group reservation**
Application identity, group reservation identity, name (list), number of men, number of women, arrival date, checkout date, special requirement, administrator's notes.
- **Activity type**
Activity identity, application identity, comment made in the application, administrator's notes.
- **Course activity**
Course identity, activity identity, administrator's notes.
- **Research activity**
Project identity, application identity, publications, administrator's notes.
- **Educational activity**
Course identity, activity identity, administrator's notes.
- **Publication database**
Publication identity, personal identity, activity identity.
- **Financier**
Financier identity, activity identity, application identity, application description

Storage time in INTERACT GIS concerning different activity roles and types of personal data is described in the chapter "Processing of personal data" above.

Rights regarding the processing of personal data

Account holders have the right under certain circumstances to have their personal data pseudonymised, corrected, and/or restricted, to gain access to collected, stored, and shared personal data, and the right to object to the processing of personal data due to personal circumstances. Please contact the controller field station to avail of the account holder's rights.

Complaints regarding the processing of personal data

If you have views on the Field Station's personal data processing, you can contact the controller field station.

If you are not satisfied with the Field Station's response, you can contact the Data Protection Authority in the country where the Field Station is located, and present your complaint regarding the Field Station's processing of your personal data.

You can read more about the Data Protection Authority's oversight on its website in the country where the Field Station is located.