



PRIVACY NOTICE

You are participating in scientific research. This privacy notice informs you about the processing of your and/or your child's personal data as part of the research. You have a legal right to receive this information under the European Union and Finnish legislation.

1. Data Controller(s) in a study Interaction, Development and Learning (VUOKKO)

The Data Controller is responsible for the lawful processing of personal data in this research.

The Data Controller of this research is: the University of Jyväskylä (JYU), Seminaarinkatu 15, P.O. Box 35, 40014 University of Jyväskylä. Business ID 0245894-7. Data Protection Officer: tietosuoja@jyu.fi, + 358 40 805 3297.

Responsible leader or team of the research

Responsible leader:

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Contact persons:

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Team members who process personal data in this research: Personal data is being processed by research group members from the Department of Education and Department of Teacher Education. Research group members have an employment with the JYU.

2. Processor(s) of personal data

Processor of personal data refers to somebody processing personal data on behalf of the Data Controller and according to the Data Controller's instructions. A Data Processing Agreement must be signed with the processor of personal data. In this research, personal data are processed by:

- Webropol
- RedCap

- Research assistants and Bachelor and Master students who are conducting research as part of the VUOKKO-study, and with whom the data processing agreement will be signed.

During research, the Data Controller can also use other processors of personal data who cannot be named beforehand. Necessary agreements are always signed with the processors and their eligibility for the processing of personal data in terms of information security is assessed before signing the agreement. The data subject will be informed separately about the use of another processor if the change is significant from the data subject's point of view.

To ensure the accuracy of research data, the Data Controller may submit data for processing (primarily without direct identification data) to a so-called research reviewer or verifier for a defined period when necessary. These reviewers or verifiers work under the supervision of research staff, and data processing agreements are signed with them.

3. Other disclosure of personal data during research

Your data will be handled confidentially and without disclosing them to any outsiders.

Or

Your data can be delivered during this research, for a purpose complying with the original purpose, to researchers outside the research group, when the processing of these data is based on public interest. In such cases, sufficient technical and organisational protective measures will be taken care of. If you wish, the research manager in charge will give you specific information about the source to whom your personal data has been disclosed.

Identification data (a person register for the longitudinal research, including the names and contact details) will not be given at any stage to any third-party recipients outside the research team. Neither will the code key, i.e. a separate file to protect direct identification data of the subjects, be delivered to any third-party recipients. Parts of the pseudonymised research data (survey responses, results of the skill assessments, numeric codes from the observational data, pseudonymised interview transcripts) can be given, by permission of the principal investigator in charge, to other universities and researchers in Finland for scientific research on the grounds of public interest. When delivering such data, an agreement is made to bind the recipient to comply with responsible conduct of research, i.e. taking care of the anonymity of the participants and appropriate keeping and erasure of the data after the agreed usage.

If a reward or cost reimbursement is paid to the research subject, the payer discloses statutory information to the Incomes Register Unit for the Incomes Register without being hindered by confidentiality provisions and other restrictions on access to information (Act on the income information system 53/2018).

4. Personal data to be processed in [add the name of the study]

Your personal data will be processed for the research purpose described in the information letter. In this research, we will collect the following personal data on you and your child:

Guardians: Date of birth, name, email address, phone number, survey on paper and/or webropol&redcap-survey

Children: Date of birth, name, school, class, audio- and video recordings, results of the skill assessments in reading and math, survey responses.

Classroom teachers: Date of birth, name, email address, phone number, survey responses (on paper and/or webropol&redcap-survey), interview data, audio- and video recording. Data collection is based on the research plan.

Teachers will be paid a reward and/or reimbursement (gift certificate á 20€). For taxation purposes, your name, nationality, social security number, and address are needed. The payer reports the monetary reward and/or cost

reimbursement to the Incomes Register. When the University of Jyväskylä pays a reward or cost reimbursement, the University will store your personal data for 10 years.

This research involves the **processing of personal data of the following special categories** or offenses and criminal records:

- ☐ Race or ethnic origin
- ☐ Political opinion
- ☐ Religious or philosophical beliefs
- ☐ Trade union membership
- ☐ Genetic data
- ☐ Processing of biometric data to uniquely identify a natural person
- ☒ Health
- ☐ Sexual behavior or orientation
- ☐ Offences and criminal records

This privacy notice is published on the website of the study and data subjects have received an electronic questionnaire including a direct link to this information.

5. The lawful basis for processing personal data in scientific research

- ☒ Scientific research serving a public interest (GDPR, Article 6.1e, special personal data categories 9.2j)

6. Transfer of personal data outside the EU/EEA area

In this research, your personal data will not be transferred outside the EU/EEA area.

7. Protection for personal data

Processing of personal data in this research is based on an appropriate research plan and the study has a designated person in charge. The personal data collected and saved for this research will include only such data that is necessary for the research purpose.

Preventing identification

- ☒ As a protective measure, any direct identification data are removed upon the compilation of the data set (pseudonymised data allowing restored identification using codes or equivalent information, and also new data connected to the data set).
- ☒ The data is partially analysed with direct identification data because audio- and video recordings cannot be pseudonymised, which is why they are analysed with direct identification data. These recordings are only in the use of the research group members.

The personal data processed in this research will be protected using:

- ☒ user ID ☒ password ☐ registered use ☒ access control (physical spaces)
- ☐ by other means, how:

For this study, a separate data protection impact assessment has been made.

- ☒ Yes ☐ No, because the researcher in charge has checked that the impact assessment is not compulsory.

The researchers have completed data protection and information security training

☒ Yes

Agreements with research assistants and/or processors of personal data /Joint Data Controllers

☒ Yes

8. PROCESSING OF PERSONAL DATA AFTER THE RESEARCH HAS ENDED

☒ The research register will be archived with identification data, i.e. including personal data, after the study has ended.

Longitudinal data has significant value, due to which the whole data will be archived, but only video recordings will be archived with identification data. Archived data will be securely stored at the University servers.

Lawful basis for archiving personal data included in research data after the study has ended

☒ Archiving of research data and cultural heritage material based on *general interest* (a research data set is archived after the study has ended and the archived material includes personal data), a value assessment is made for the material to be archived (GDPR, Article 6.1e, special personal data categories 9.2j).

9. Rights of the data subject

Cancellation of consent (GDPR, Article 7)

You have the right to cancel your consent if the processing of personal data is based on consent. Such a cancellation has no impact on the lawfulness of consent-based processing conducted before the cancellation of consent.

Right to access your personal data (GDPR, Article 15)

You have the right to get to know whether and which personal data of yours are processed. If you wish, you can also request a copy of your personal data to be processed.

Right to rectification (GDPR, Article 16)

If there are any inaccuracies or errors in your personal data to be processed, you are entitled to request that these be rectified or supplemented.

Right to erasure (GDPR, Article 17)

You have the right to demand in some cases that your personal data be erased. However, the right of erasure is not applicable if the erasure would prevent or greatly hinder reaching the goal of processing in scientific research.

Right to restriction of processing (GDPR, Article 18)

You have the right to restrict the processing of your personal data in some cases, like when you challenge the correctness of your personal data.

Deviating from the rights

In some individual cases, it is possible to deviate from the described rights on the grounds stipulated in the GDPR and the Data Protection Act insofar as the rights would prevent or greatly hinder reaching the goals of scientific or historical research or statistical purposes. The need for deviating from the rights is always assessed case-specifically. It is also possible to deviate from the rights if the data subject cannot, or cannot any longer, be identified.

Archiving

When personal data are processed for archiving purposes serving a public interest, the data subjects do not generally have the above-described rights or the right to object the processing (GDPR, Article 21). The

authenticity, reliability, and research value of archived materials would be at risk if the personal data included were changed. Deviation from data subject rights is based on the Data Protection Act, section 32, and the GDPR, Articles 17.3 and 21.6.

Profiling and automatised decision-making

In this research, your personal data will not be used for any automatic decision-making. In this research, the purpose of the processing of personal data is not to assess your personal qualities, i.e. profiling, but personal data and qualities are considered from the perspective of broader scientific research.

Implementing the data subject rights

If you have any questions about your data subject rights, you can contact the University's Data Protection Officer. All requests concerning the implementation of data subject rights are submitted to the JYU Registry Office. Registry Office and Archives, P.O. Box 35 (C), 40014 University of Jyväskylä, tel. 040 805 3472, email: kirjaamo@jyu.fi. Visiting address: Seminaarinkatu 15, Building C (University Main Building, 1st floor), Room C 140.

Reporting an actual or suspected information security breach to JYU

<https://help.jyu.fi/jp>

You have to lodge a complaint with a supervisory authority, especially with a locally relevant one in terms of your permanent place of residence or work if you regard that the processing of personal data violates the EU General Data Protection Regulation (EU) 2016/679. In Finland, the supervisory authority is the Data Protection Ombudsman.

Updated contact information of the Office of Data Protection Ombudsman: <https://tietosuoja.fi/etusivu>