



15 January 2024

PRIVACY NOTICE

You are participating in scientific research. This privacy notice informs you about the processing of your 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 Kasvu Open Survey

The **Joint Data Controllers** of this research are:

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

Kasvu Open, Crazy Town, Kauppakatu 39, 40100 Jyväskylä. Business ID 2771144-3. Data Protection Officer: jaana.seppala@kasvuopen.fi, +358 5 030 46794

Responsible leader or team of the research

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Team members who process personal data in this research:

Name: Mari Suoranta
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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 NextCloud which the university hosts, and there are no data processors.

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.

4. Personal data to be processed in Kasvu Open Survey

All data subjects are adults, over the age of 15. Your personal data will be processed for the research purpose described in the information letter.

In this research, we will collect personal data on you [e.g. name, company details, designation, email address, survey responses, or other such material.] Data collection is based on the research plan.

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 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 personal data processed in this research will be protected using:

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

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, approximately from December 2024.

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>