



6 August 2025

## 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 the project *Generation X, Y and Z and digital language practices: Intra- and intergenerational meaning-making, adaptation and attitudes [XYZdigi] (2025–2028)*

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

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](mailto:tietosuoja@jyu.fi), +358 40 805 3297.

University of Copenhagen, Nørregade 10, København K. DPO: Mads Tolderlund, [mat@adm.ku.dk](mailto:mat@adm.ku.dk), +45 35328395.

University of Gothenburg, Department of Swedish, Multilingualism and Language Technology, with its postal address being P.O. Box 200, SE405 30 Gothenburg DPO: [dataskyddsbud@gu.se](mailto:dataskyddsbud@gu.se).

The Joint Data Controllers have jointly defined the purposes and means of the processing of personal data (research plan/data management plan).

### Responsible leader of the research

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Email: [asa.palviainen@jyu.fi](mailto:asa.palviainen@jyu.fi)

Work address: Department of Language and Communication Studies, P.O. Box 35, 40014 University of Jyväskylä

### Team members who process personal data in this research:

Åsa Palviainen, Kira Heiskanen, Andreas Candefors Stæhr, Marianne Haugaard Skov and Åsa Wengelin.

### 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:

University of Jyväskylä data processors: Microsoft JYU administered cloud services.

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 XYZdigi**

Your personal data will be processed for the research purpose described in the research notification.

In this research, we will collect the following personal data of the research participants: name, email address, audio recordings, video recordings, field notes, chat logs, screen recordings, and screenshots. Data collection is based on the research plan.

In addition to personal data of the actual research participants, the digital conversations submitted by the research participants may contain personal data of other people who are mentioned in those digital conversations.

This research does not involve the processing of personal data of special categories.

This privacy notice is published on the website of the study. Research participants have also received a paper version of the privacy notice.

### **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**

The collected material will be pseudonymized before analysis to the extent that is possible: No direct identification data are collected and a data subject can be identified from the data only indirectly, i.e. by connecting the data with information from other sources in order to identify the person. For certain purposes, direct identifiers are not erased in the analysis phase of audio or video recorded interviews or of visual and audio elements in chats when they are an inevitable part of the data. Data with direct identifiers

will only appear in publications or conference presentations upon written permission from the data subjects.

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

- ☒ password: Data on workstation are stored on password protected Home directory U-drive, JYU NextCloud, and JYU OneDrive. Data collected on JYU Android mobile phone are pin code protected.
- ☒ access control (physical spaces): Signed letters of consent are stored in a locked compartment in an office with access control.

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

☒ Yes

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 deleted after the research has ended on December 31<sup>st</sup> 2028, unless a letter of consent of transfer of data to the cultural heritage archive *the Society of Swedish Literature in Finland's archives* has been signed.
- ☒ The research register will be archived with identification data, i.e. including personal data, after the study has ended, from January 1<sup>st</sup> 2029, if the research participant has consented to that the data is transferred to the cultural heritage archive *the Society of Swedish Literature in Finland's archives*.

**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](mailto:kirjaamo@jyu.fi). Visiting address: Seminaarinkatu 15, Building C (University Main Building, 1<sup>st</sup> floor), Room C 140.

### Reporting an actual or suspected information security breach to JYU

<https://www.jyu.fi/en/report-a-data-security-breach>

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.

The Office of Data Protection Ombudsman in Finland: <https://tietosuoja.fi/en/home>

The Danish Data Protection Agency: <https://www.datatilsynet.dk/english>

The Swedish Authority for Privacy Protection (IMY): <https://www.imy.se/en/>