



## PRIVACY NOTICE

You are participating in scientific research “Kohti YKI-tutkintoa”, which is part of the IMPACT project at the Centre for Applied Language Studies at the University of Jyväskylä. 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 project IMPACT’s scientific study “Kohti YKI-tutkintoa”

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

Primary contact for the research team: yki-tutkimus@jyu.fi

Research leader: Mari Honko

Phone number: +358408053165

Email: [mari.h.honko@jyu.fi](mailto:mari.h.honko@jyu.fi)

Work address: Centre for Applied Language Studies, AgC531.2, 40014 Jyväskylän yliopisto

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

Personal data are primarily processed by researchers at the Centre for Applied Language Studies at the University of Jyväskylä, who are specifically appointed to the working group. Personal data may also be processed by research assistants and thesis authors involved in the research, when it is necessary, for example, to reach the research subject (name, contact information) or to process the data (e.g. audio file). All processors of personal data are bound by confidentiality obligations.

### 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:

- Researchers at the Centre for Applied Language Studies, University of Jyväskylä
- Other members of the research team (e.g. research assistant, thesis author) involved in the research, with whom a separate data processing agreement is concluded.
- Webropol survey software and Microsoft services, with whom the University of Jyväskylä has a valid data processing contract, for the data compilation.
- Nextcloud

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 project IMPACT's study "Kohti YKI-tutkintoa"**

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

The following personal data or material that may contain personal data will be collected from you: name, voice recordings, notes from observation and interviews, photos, videos, learning diary, possible survey answers, contact information of your choice. The collection of data is based on the research design.

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

This privacy notice has been published on the research project's website.

All subjects of the study are of legal age (over the age of 18).

### **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.

#### **Removal of identifiable information**

- ☒ 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 information collected in the study are protected using

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

The survey will primarily collect and process electronic data. Any other data (e.g. paper questionnaires) will be stored in a secure room at the Centre for Applied Language Studies.

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 anonymised at the end of the study, estimated to be by 31.7.2028, i.e. all identifying data will be completely erased so that there is no return to identifying personal data and no new data can be combined with the data. If a follow-up study is launched before the end of the study, the code key of the pseudonymised data may be kept until the necessary data are merged. Participants will be asked separately about participation in any follow-up study and participation is voluntary.

## 9. Rights of the data subject

### 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.

### Right to object (GDPR, Article 21)

You have the right to object to the processing of your personal data if the processing is based on public interest or legitimate interest. In this case, the controller may not process your personal data unless it can demonstrate that there are compelling legitimate grounds for the processing which override your rights.

#### 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.

#### 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, 1<sup>st</sup> floor), Room C 140.

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>