



PRIVACY NOTICE FOR SCIENTIFIC RESEARCH

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.

1. Data controller(s) in the study *STRONG – Strengthening Early Childhood Professionals’ Well-being at Work*

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

The data controller of this research is: University of Jyväskylä, Seminaarinkatu 15, P.O. Box 35, 40014 University of Jyväskylä. Business ID 0245894-7 Data protection officer: tietosuoja@jyu.fi, 040 805 3297.

Person or group responsible for the research

Name: Eija Sevón

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Members of the research team processing personal data in this research:

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The data will also be processed by doctoral researchers, research assistants, trainees, and students writing their theses for the project who will be recruited in the future. A separate agreement on the processing of personal data will be concluded with those processing the material who are not employed by the University of Jyväskylä. Further information on the people involved can be obtained from the principal investigator.

2. Processor(s) of personal data

A *processor of personal data* refers to a party that processes 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, the processors of personal data are the following: cloud services managed by Microsoft JY and Webropol Oy (survey software).

During the implementation of the research, the data controller can also use processors of personal data who cannot be named in advance. Appropriate agreements must always be made with processors. Suitability of the processors for the secure processing of personal data must be assessed before an agreement is made. 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. Data processing agreements are made with them if they receive personal data.

3. Other disclosure of personal data during research

Your personal data will be handled confidentially and will not be disclosed to third parties.

4. Personal data to be processed in STRONG – *Strengthening Early Childhood Professionals' Well-being at Work*

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:

- age
- gender
- ethnic background
- education
- job title
- length of work experience in early childhood education
- working language
- municipality of employment
- postcode of early childhood education unit
- name of early childhood education unit and child group
- health related to well-being at work
- answers to open-ended questions may contain personal data

The collection of data is based on the research plan.

The following special categories of personal data or information on offences and criminal convictions are processed in this research:

- ☒ Race or ethnic origin
- ☒ Health

This privacy notice will be provided to participants together with the research information sheet. Research consent will be collected from participants electronically using Webropol.

5. The legal 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 data outside the EU/EEA

In this research, your personal data

- ☒ will not be transferred outside the EU/EEA.

7. Protection of personal data

The processing of personal data in this study is based on an appropriate research plan, and the study has a designated person in charge. Only personal data necessary for the purpose of the study will be processed as research material.

Removal of identifiability

- ☒ No direct identifying information is collected; the data subject can only be indirectly identified from the material, i.e., if the material were to be combined with information obtained from elsewhere and used to identify the data subject.

The personal data processed in the study is protected

- ☒ with a user ID ☒ password ☐ with user registration ☒ with access control (physical space)
☒ in other ways, such as: By storing the data in such a way that only designated persons have access to it. The data collected in connection with the study is stored securely. The research data is stored carefully in accordance with the University of Jyväskylä's data security practices for the processing of research data.

A separate data processing impact assessment has been carried out for the study

- ☒ No, because the author of this study has verified that an impact assessment is not mandatory.

The researchers have completed data protection and data security training.

- ☒ Yes

Agreements with research assistants and/or personal data processors.

- ☒ Yes

8. Duration of the processing of personal data

☒ The research data will be archived with identifying information, that is, containing indirect personal data, starting from approximately 12/2036 in the University of Jyväskylä archives. Archived material may be used for scientific research based on a research plan and in the public interest. In such cases, the university archives will manage the rights to use the material. The use of archived material is restricted to research purposes only.

Legal basis for archiving personal data contained in research data after the research has ended

☒ Archiving of research data and cultural heritage material *based on general interest* (research data is archived after the research 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

Right to access data (Article 15, General Data Protection Regulation GDPR)

You have the right to obtain information about whether your personal data is processed, and which personal data is processed. If you want, you can also request a copy of the personal data processed in the study.

Right to have data rectified (Article 16, GDPR)

If there are inaccuracies or errors in your personal data processed in the study, you have the right to request their rectification or supplementing.

Right to have data erased (Article 17, GDPR)

You have the right to request your personal data to be erased in certain situations. However, you do not have the right to erasure if it prevents or significantly complicates the realisation of the purpose of processing in scientific research.

Right to the restriction of processing (Article 18, GDPR)

You have the right to restrict the processing of your personal data in certain situations, for example, if you deny the accuracy of your personal data.

Derogation from the rights

Derogation from the aforementioned rights is possible in certain individual situations on the basis of the GDPR and the Finnish Data Protection Act, insofar as the rights prevent or significantly complicate the realisation of scientific or historical research purposes or statistical purposes. The need for derogation must always be assessed separately for each situation. Furthermore, derogation from these rights is possible if the controller demonstrates that it is unable to identify the data subject.

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 to 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.

Profiling and automated decision-making

In this study, your personal data will not be used in automated decision-making. The purpose of processing personal data in this study is not to evaluate your personal characteristics, i.e. profiling, but rather to evaluate your personal data and characteristics from the perspective of broader scientific research.

Implementing the rights of the data subject

If you have questions on the rights of data subjects, please contact the University's data protection officer. All requests concerning the execution of the rights must be submitted to the Registry Office of the University of Jyväskylä. Registry Office and Archive, P.O. Box 35 (C), 40014 University of Jyväskylä, tel. +358 40 805 3472, email: kirjaamo(at)jyu.fi. Street address: Seminaarinkatu 15, Building C (Main Building), floor 1, room C 140.

Reporting actual or suspected data breaches to the University of Jyväskylä:

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

You have the right to file a complaint with the supervisory authority of your permanent place of residence or employment or place of the alleged infringement, if you feel that the processing of personal data is in breach of the GDPR (EU 2016/679). In Finland, the national supervisory authority is the Data Protection Ombudsman.

Current contact information for the Office of the Data Protection Ombudsman: <https://tietosuoja.fi/en/home>

Visiting address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: P.O. Box 800, 00531 Helsinki, Finland

E-mail: tietosuoja@om.fi

Switchboard: +358 (0)29 566 6700

Registry: +358 (0)29 566 6768