



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 in accordance with the European Union and Finnish legislation.

1. Data Controller(s) in the study Tango Across Generations (TAG)

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

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

Name: Patti Nijhuis
Phone number: +358504680404
Email: patti.p.nijhuis@jyu.fi
Work address: PO Box 35(M)
40014 University of Jyväskylä

Team members who process personal data in this research:

The personal data in question here includes: Name, email addresses, and health and wellbeing surveys.

Person or group responsible for the research

Name: Patti Nijhuis
Phone number: +358 504680404
Email: patti.p.nijhuis@jyu.fi
Work address: Seminaarinkatu 15, 40100 Jyväskylä. M305, Musica building.

Members of the research team processing personal data in this research: Patti Nijhuis (PI), Martin Hartmann, Fernando Waisberg (tango teacher, external), research assistants (N.N.), all except Fernando are part of the Department of Music, Arts and Culture.

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:

- Webropol (for hosting the contact form). The university has a Data Processing agreement with Webropol to ensure the safety of your data.
- REDCap (for hosting the survey data). The university has a Data Processing agreement with REDCap to ensure the safety of your data.
- Microsoft

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 the TAG Study

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

We will collect the following personal data: **age, gender, survey responses, video footage, and interview audio and transcripts** as part of the anonymous research data. The collection of data is based on the research plan.

We will collect video footage of you to assess movement quality, and how it improves as the program progresses. You might be identifiable in this footage, but the video footage will not be shared or published outside these specific studies. The published research will be based on features extracted from your movement in the videos, not the raw video.

The following non-personal data will be collected: NA

This research involves processing of personal data of special categories: health data (Surveys, and interview)

This privacy notice has been posted on the website of the study, and the research subject has been provided with a direct link to this information prior to consenting to filling out the online questionnaire.

All data subjects are adults and minors (15+).

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)

The processing of your personal data is necessary for scientific research purposes on the grounds of public interest, in compliance with Section 4, Subsection 3 of the Data Protection Act. Special categories of personal data (health data) are processed for the purpose of scientific research in compliance with Section 6, Subsection 7 of the Data Protection Act.

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. Only personal data necessary for the purpose of the study will be processed as research material.

The personal data of research participants is only processed in environments and using tools that the data controller has determined to be sufficiently secure for the processing of personal data. Special categories of personal data are subject to enhanced data security requirements. A separate data management plan has been drawn up for the processing of the data.

Whenever possible, identifying information is removed from the data as a protective measure (pseudo-anonymisation, for example blurring faces on videos). Identifiability should then only be restored using a code or similar information. We cannot guarantee that even data that is not linked to your name or contact information could not be identified in the future, from for example movement recognition software. Hence, we will not publish any data that carries such risk, i.e. health data, personal data, and the blurred movement videos for open access. During the life cycle of the data, the principle of minimising personal data and the requirement of necessity are taken into consideration.

8. Duration of the processing of personal data

The estimated time for archiving the research data is December 2028. Only the directly identifiable information will be destroyed: Name, email address, and the document linking these to the anonymous ID codes used. Furthermore, raw video and audio recordings will be deleted as soon as their relevant movement data and transcriptions are extracted and anonymised. The remaining pseudo-anonymous dataset will be archived in JYU data archive by the end of 2028.

Because we can only ensure pseudo-anonymisation, we will not publish any of the personal data, only meta-data. Access to the data will only be granted for research purposes that adhere to good scientific and ethical conduct.

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. As a rule, the rights of the data subject must be fulfilled if the data subject, for the purpose of exercising their rights, provides additional information enabling their identification.

Automated decision-making

In this study, your personal data will not be used in automated decision-making.

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 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>