



September 1, 2026

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 Collaborative Curriculum Development and Pedagogical Leadership at the University of Jyväskylä (Finnish acronym YOJO)

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

The Principal Investigator of the study:

Name: Research Professor Johanna Annala
Phone number: +358 50 466 8141
Email: johanna.s.annala@jyu.fi
Work address: Alvar Aallon katu 9, 40014 University of Jyväskylä

Personal data will be processed by the PI of YOJO project and members of the research team (Jani Ursin, Kaisa Silvennoinen). The research team may also include other project-affiliated researchers appointed at a later stage, such as research assistants or students undertaking thesis work, who process the data as part of the implementation of the research. All persons involved in processing the research data are subject to a duty of confidentiality and will process the data exclusively for research purposes.

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:

- Microsoft services administered by the University of Jyväskylä
- MyJYU AI Transcription
- ATLAS.ti Scientific Software Development GmbH
- Webropol Oy, survey software
- CSC, Funet Miitti Zoom video conferencing service

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. The data controller may disclose information during the research from which you cannot be identified. In this context, these refer to external collaborators who are important to the YOJO project, such as individuals from other higher education institutions who contribute to research activities within the YOJO project, for example through thesis work or other forms of research collaboration, as well as researchers from other universities involved in co-authored publications.

4. Personal data to be processed in Collaborative Curriculum Development and Pedagogical Leadership at the University of Jyväskylä (Finnish acronym YOJO)

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:

Interview Data

The interview data comprise both direct and indirect personal data. In this context, direct personal data include, for example, participants' names and email addresses (collected via a Webropol registration form for the purpose of arranging participation in the interviews), as well as audio recordings of the interviews. Indirect personal data include, for example, participants' affiliation, position within the University of Jyväskylä, and stakeholder group, such as research and teaching staff.

The collection of data is based on the research plan. The research does not process any special categories of personal data and does not involve sensitive personal data, such as information relating to an individual's health.

5. The legal basis for processing personal data in scientific research

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.

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.

The personal data of research subjects 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 (pseudonymisation). Identifiability can then be restored using a code or similar information. 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 research data consist of interview data (interview recordings and transcriptions).

Research data containing direct identifiers (e.g., interview recordings) will be processed in accordance with data protection requirements and principles of research ethics. Interview recordings will be retained only for the period necessary for transcription and verification and will be destroyed no later than 31 December 2028. This also applies to personal data collected for the purpose of arranging participation in the interviews (i.e., name and email address).

With regard to the interview data, it should be noted that, due to their context-specific nature, complete anonymisation of all material may not be possible. If the data contain identifiable individuals, situations, or organisations that cannot be adequately anonymised, the relevant parts of the data will be destroyed following the completion of the study and publication of the results, in accordance with data protection principles.

Where permitted by research ethics principles and applicable data protection legislation, the anonymised data will be archived by approximately 30 June 2029 in JYU's JYX service or another comparable research data repository. The data may then be made available for research and educational purposes in accordance with the terms and conditions of the repository. Anonymisation will be carried out by removing or modifying all direct and indirect identifiers so that individual persons, organisations, or situations cannot be identified.

The anonymised research data will be retained for long-term preservation and are expected to be stored until approximately 2038. After that, the data may be destroyed, or their retention may be reassessed if they are considered to have particular research value.

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.

Right to object (Article 21, GDPR)

The data subject has the right, in certain situations, to object to the processing of their personal data. If the data subject objects to the processing, the personal data may no longer be processed unless the controller demonstrates compelling legitimate grounds for the processing.

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 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>