



## PRIVACY NOTICE FOR SCIENTIFIC RESEARCH

Your child is participating in scientific research. This privacy notice informs you about the processing of your child's personal data as part of the research. You have a legal right to receive this information.

### 1. Data controller in the study *IDEAL – Individual differences in early foreign language learning*

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: Anssi Roiha

Phone number: 050 465 0445

Email: [anssi.s.roiha@jyu.fi](mailto:anssi.s.roiha@jyu.fi)

Work address: Department of education, University of Jyväskylä, PL 35, 40014 University of Jyväskylä

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

Doctoral researchers Hanna Pöyliö and Otso Ahosola. Additionally, other members of the research project working as faculty of the University of Jyväskylä or as postgraduate or degree students. A written agreement for the processing of personal data is made with members of the research team who are not employed (e.g. students.).

### 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
- CSC, Funet Miitti Zoom video conferencing service
- Webropol Oy, survey software
- Atlas.ti Scientific Software Development GmpH

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 child's personal data will be handled confidentially and will not be disclosed to third parties.

### **4. Personal data to be processed in *IDEAL – Individual differences in early foreign language learning***

Your child's 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 your child: name, date of birth, age, school's name and municipality, class grade and class identifier (e.g. 1A, 1B etc.), language and school history, audio recordings, observation and interview notes, visual productions, the name of at least one guardian.

The collection of data is based on the research plan.

The following special categories of personal data or information are processed in this research:

☒ Health: possible diagnoses related to learning and attending school, for example specific developmental disorders of speech and language or disorders of scholastic skills (disorders in reading and writing, commonly referred to as dyslexia)

This privacy notice has been posted on the website of the study, and the guardian has been provided with access to this information via a direct link or a printed copy of the research participation form.

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

The processing of your child's 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 or information on offences and criminal convictions are processed for the purpose of scientific research in compliance with Section 6, Subsection 7 of the Data Protection Act.

### **6. Transfer of data outside the EU/EEA**

In this research, your child's 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 is anonymised at the end of the research estimated around December 2037, meaning that all identifying information will be removed entirely such that there can be no return to identifiable personal data and no further information can be added to the data.

Until then, the interview and questionnaire data is preserved as pseudonymised data, meaning that it is possible to return to identifiable information via a code or comparable information. When the data is anonymised, all material that includes personal information is destroyed.

## 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 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>