



14.8.2025

## PRIVACY NOTICE – CHILDREN'S GUARDIANS AND CHILDREN

You and your child are participating in scientific research. This privacy notice informs you about the processing of your and your child's personal data as part of the research. You have the right to receive this information by law.

### **Data controller(s) in the study SITES – Social inclusion and diversity in Early Childhood Education and care study**

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](mailto:tietosuoja@jyu.fi), 040 805 3297.

### **Research directors**

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### **Members of the research team who process personal data in this research:**

SITES project researchers, all of whom are employed by the University of Jyväskylä, as well as postgraduate students who will be recruited to the project in the future. The data will also be processed by the project's research assistants, trainees, and students writing their theses on the project. A separate agreement on the processing of personal data will be concluded with persons other than those employed by the university who handle the material. Further information on these persons can be obtained from the directors.

### **Processor(s) of personal data**

A personal data processor refers to an entity that processes personal data on behalf of the controller and in accordance with the instructions provided by the controller. A data processing agreement must be drawn up with the personal data processor. In this study, the processors of personal data are the following information systems and data processing tools: Cloud services managed by Microsoft JY.

During the implementation of the study, the controller may also use other processors of personal data who cannot be named in advance. The necessary agreements are always made with the processors, and their suitability for the secure processing of personal data is assessed before the agreement is made. The data subject will be informed separately of the use of a processor if the change is significant from the data subject's point of view.

In order to ensure the accuracy of research data, the controller may, if necessary, provide data (primarily without direct identifiers) to a research monitor or verifier for a fixed period of time. These persons work under the supervision of the research staff, and data processing agreements are concluded with them.

#### **Other disclosure of personal data during research**

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

#### **Personal data processed in the SITES – Social inclusion and diversity in Early Childhood Education study**

Your personal data will be processed for the research purposes described in the notice.

The following personal data about you and your child will be collected in the study: **guardian**: name, age, gender, email address, phone number, country of birth, nationality, native language and languages spoken at home, religious or philosophical beliefs, video recording, audio recording, early childhood education plan discussion, interview notes; **child**: name, age, gender, country of birth, nationality, native language and home languages, religious or philosophical beliefs, video recordings, audio recordings, observation notes, interview notes, photographs, videos, network map, early childhood education plan, and other early childhood education documentation related to the child. The collection of data is based on the research plan.

The study deals with the following specific categories of personal data:

- Race or ethnic origin
- Religious or philosophical conviction
- Health

This privacy notice is provided to research participants together with the research information sheet. Consent forms are mainly collected from participants electronically using Redcap, but participants can also fill out a paper consent form if they wish, which will be stored electronically and destroyed in paper form. The consent of children to participate in the study will be ensured at an age-appropriate level before data collection, and the consent of children will also be closely monitored and evaluated during data collection.

#### **Legal basis for processing personal data in scientific research**

- Scientific research in the public interest (Article 6.1.e of the General Data Protection Regulation, special categories of personal data 9.2.j)

#### **Transfer of personal data outside the EU/EEA**

Your personal data will not be transferred outside the EU/EEA in connection with this study.

#### **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 data that is necessary for the purpose of the study will be stored in the study registry.

#### **Removing identifiability**

- Direct identification data is removed as a protective measure during the creation of the data (pseudonymized data, in which case identifiability can be restored using a code or similar information, and new information can be linked to the data) to the extent possible (e.g., observation notes, interview notes, and transcripts).
- Video and audio recordings and photographs are stored and analyzed with direct identification data, as removing direct identification data from them is often challenging and attempts to do so may compromise the quality of the material.

#### **Personal data covered by the study is protected**

- with a user ID
- with a password
- by registering for use
- access control (physical space)
- in other ways, such as: storing the data in such a way that only designated persons have access to it.

The data collected in connection with the study will be stored securely, and only researchers involved in the SITES research project will have access to personal data. The research data will be stored carefully in accordance with the University of Jyväskylä's data security practices concerning the handling of research data.

#### **A separate data protection impact assessment has been carried out for the study.**

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

Researchers have completed data protection and data security training  Yes

Agreements with Research Assistants and/or personal data processors  Yes

#### **Duration of the processing of personal data**

The research register will be archived at the end of the original research use, estimated to be at the end of 2036, with identifying information, i.e., including personal data, in the archives of the University of Jyväskylä. The research group may use the archived material for scientific research in the public interest based on the research plan submitted to the archive. The material is not openly available, but any requests from outside the research group to use the material will be assessed by the University of Jyväskylä on a case-by-case basis.

**Legal basis for archiving personal data contained in research material after the research has been completed**  
 Archiving of research materials and cultural heritage materials in the public interest (research material is archived after the research has been completed and the material to be archived contains personal data), the material to be archived is assessed for value (Article 6.1 e of the General Data Protection Regulation, special categories of personal data 9.2.j).

#### **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.

### 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 and 21.6.

### Profiling and automated decision-making

Your personal data will not be used for automated decision-making in the study. The purpose of processing personal data in the 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 a data breach or suspected breach 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>