



## 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 under the European Union and Finnish legislation.

### 1. Data Controller(s) in a study “Inclusive multilingual and intercultural workplace” (IMU)

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

The Data Controller of this research is: the 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: Lotta Kokkonen

Phone number: +358408053148

Email: lotta.o.kokkonen@jyu.fi

Work address: University of Jyväskylä, Centre for Multilingual Academic Communication MOVI, Seminaarinkatu 15, 40014 University of Jyväskylä

#### Team members who process personal data in this research:

Name: Malgorzata Lahti

Phone number: +35840 5767852

Email: malgorzata.lahti@jyu.fi

Work address: University of Jyväskylä, Department of Language and Communication Studies, Seminaarinkatu 15, 40014 University of Jyväskylä

Name: Sari Rajamäki

Phone number: +358505727433

Email: sari.v.p.rajamaki@jyu.fi

Work address: University of Jyväskylä, Department of Language and Communication Studies, Seminaarinkatu 15, 40014 University of Jyväskylä

Personal data collected in the project will also be processed by yet to be recruited master's and doctoral level students working in the project as team members. Any such members will sign a commitment before they can process the data.

### 1. Processor(s) of personal data

Processor of personal data refers to somebody processing 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, personal data are processed by:

- Microsoft JYU administered cloud services: O365, OneDrive, Teams, OneNote, Sharepoint, JYU Teams (video, chat, audio calls)
- JYU Moniviestin (video recording transcription)
- MyJYU application (interview recording and transcription): [MyJYU AI Transcription Guide](https://video.rc.jyu.fi/guide/myjyu-ai-transcription-guide) (<https://video.rc.jyu.fi/guide/myjyu-ai-transcription-guide>)

- JYU Zoom (videocalls and chat)
- NextCloud (data storage)
- Webropol (survey software)
- Teams and/or the target organisation's collaboration platform approved as data secure (video recordings of team meetings)

During research, the Data Controller can also use other processors of personal data who cannot be named beforehand. Necessary agreements are always signed with the processors and their eligibility for the processing of personal data in terms of information security is assessed before signing the agreement. 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, and data processing agreements are signed with them.

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

Your data will be handled confidentially and without disclosing them to any outsiders.

### **Personal data to be processed in IMU**

In the study, we will collect the following personal data: audio recordings of interviews, video recordings of team interactions. Your personal data will be processed for the research purpose described in the information letter.

In addition, we will collect the following personal data only for the purpose of sharing information about the research project or setting up a data collection session (such as team meeting recording or an interview) with you: name, email address

This research does not involve the processing of personal data related to special categories (such as ethnic origin, political opinion or sexual orientation).

This privacy notice is published on the website of the study at: [Inklusiivinen monikielinen ja monikulttuurinen työ \(IMU\) | Jyväskylän yliopisto \(https://www.jyu.fi/fi/hankkeet/inklusiivinen-monikielinen-ja-monikulttuurinen-tyo-imu-0\)](https://www.jyu.fi/fi/hankkeet/inklusiivinen-monikielinen-ja-monikulttuurinen-tyo-imu-0)

Moreover, research participants/data subjects will receive this privacy notice before the specific data collection rounds that this research involves.

## **3. 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)

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

In this research, your personal data will not be transferred outside the EU/EEA area.

## **4. 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. The personal data collected and saved for this research will include only such data that is necessary for the research purpose.

### Preventing identification

- ☒ No direct identification data are collected, a data subject can be identified from the data only indirectly, i.e. by connecting the data with information from other sources in order to identify the person.

### The personal data processed in this research will be protected using:

- ☒ user ID    ☒ password    ☒ access control (physical spaces)

For this study, a separate data protection impact assessment has been made

- ☒ No, because the researcher in charge has checked that the impact assessment is not compulsory.

The researchers have completed data protection and information security training- ☒ Yes ☐ No ☒ Yes

Agreements with research assistants and/or processors of personal data /Joint Data Controllers

- ☒ Yes

## 5. PROCESSING OF PERSONAL DATA AFTER THE RESEARCH HAS ENDED

- ☒ The research register will be anonymised after the study has ended, approximately by December 2030. This means that all identification data are fully removed so that there will be no return to the identifiable personal data, nor any new data can be connected to this data set.

## 6. Rights of the data subject

### Cancellation of consent (GDPR, Article 7)

You have the right to cancel your consent if the processing of personal data is based on consent. Such a cancellation has no impact on the lawfulness of consent-based processing conducted before the cancellation of consent.

### Right to access your personal data (GDPR, Article 15)

You have the right to get to know whether and which personal data of yours are processed. If you wish, you can also request a copy of your personal data to be processed.

### Right to rectification (GDPR, Article 16)

If there are any inaccuracies or errors in your personal data to be processed, you are entitled to request that these be rectified or supplemented.

### Right to erasure (GDPR, Article 17)

You have the right to demand in some cases that your personal data be erased. However, the right of erasure is not applicable if the erasure would prevent or greatly hinder reaching the goal of processing in scientific research.

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

You have the right to restrict the processing of your personal data in some cases, like when you challenge the correctness of your personal data.

### Deviating from the rights

In some individual cases, it is possible to deviate from the described rights on the grounds stipulated in the GDPR and the Data Protection Act insofar as the rights would prevent or greatly hinder reaching the goals of scientific or

historical research or statistical purposes. The need for deviating from the rights is always assessed case-specifically. It is also possible to deviate from the rights if the data subject cannot, or cannot any longer, be identified.

#### Profiling and automatised decision-making

In this research, your personal data will not be used for any automatic decision-making. In this research, the purpose of the processing of personal data is not to assess your personal qualities, i.e. profiling, but personal data and qualities are considered from the perspective of broader scientific research.

#### 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, 1<sup>st</sup> floor), Room C 140.

#### Reporting an actual or suspected information security breach to JYU

<https://help.jyu.fi/jp>

You have to lodge a complaint with a supervisory authority, especially with a locally relevant one in terms of your permanent place of residence or work if you regard that the processing of personal data violates the EU General Data Protection Regulation (EU) 2016/679. In Finland, the supervisory authority is the Data Protection Ombudsman. Updated contact information of the Office of Data Protection Ombudsman:

<https://tietosuoja.fi/etusivu>