University of Jyväskylä

Name of unit

Date

# Privacy notice

INSTRUCTION: use as clear expressions as possible, a consistent form of addressing, and simple language.

The research notification and the privacy notice are submitted to the University of Jyväskylä Registry Office (kirjaamo@jyu.fi) when finished if the University is a data controller, joint data controller or processor of personal data for this study.

***A rule of thumb*:** If the research is not conducted in an employment relationship to JYU or as a part of the University’s project with supplementary funding, the researcher himself/herself acts as the Data Controller of the registered data. See the instruction: [Instructions for researchers | University of Jyväskylä (jyu.fi)](https://beta.jyu.fi/en/data-privacy-at-the-university-of-jyvaskyla/instructions-for-researchers) When finished, please remove the instructions marked in grey or in yellow (the newest changes/instructions to the template are marked in yellow).

You are participating in scientific research. This privacy notice informs you about the processing of your [and/or your child’s] 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 [add the name of the study]**

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.

**OR**

The ***Joint Data Controllers*** of this research are: [INSTRUCTION: Select this if the purpose and means for the processing of personal data were defined collaboratively, i.e. the research plan/data management plan was made jointly with others, for example between consortium partners.](https://beta.jyu.fi/en/data-privacy-at-the-university-of-jyvaskyla/instructions-for-researchers)

University of Jyväskylä, Seminaarinkatu 15, P.O. Box 35, 40014 University of Jyväskylä (JYU). Business ID 0245894-7. Data Protection Officer: tietosuoja@jyu.fi, +358 40 805 3297.

INSTRUCTION: name the other Joint Data Controllers and their Data Protection Officers.

The Joint Data Controllers have jointly defined the purposes and means of the processing of personal data (research plan/data management plan).

**OR**

The researcher (the Data Controller and implementer of the research) [Contact information – at least an email address]. INSTRUCTION: Select this if the research is not conducted in an employment relationship to JYU, nor as a part of the University’s project with supplementary funding. In such a case, no Data Protection Officer is named, unless the research involves large-scale processing of special categories of personal data.

[Add also] Supervisor(s) name, position, and [[Contact information | University of Jyväskylä (jyu.fi)](https://beta.jyu.fi/en/contact)].

**Responsible leader or team of the research**

INSTRUCTION: If the University is a Data Controller /Joint Data Controller, the responsible leader or team is named /Delete this section as needed if you as a researcher are also the Data Controller.

Name:

Phone number:

Email:

Work address:

**Team members who process personal data in this research:** [INSTRUCTION: Give a list of persons who are authorised to process personal data during the research. In studies conducted by an individual researcher, it is usually sufficient that the Data Controller, the implementer of the research, and the supervisor are named above, and it is not necessary to repeat that information. Similarly, it is not necessary to list individual persons, but they can be mentioned as categories (e.g. researchers of Department X of Faculty X). NB! JYU students and JYU-affiliated researchers who process personal data (or pseudonymised datasets which are still considered to be personal data) in the research without employment with JYU can be listed as team members. They need to sign a commitment before they can process personal data. [Contracts when processing personal data — Uno Staff Portal (jyu.fi)](https://uno.jyu.fi/en/help-centre/security-and-data-privacy/data_privacy/data-processing-agreement-and-other-relevant-agreement-templates/contracts-when-processing-personal-data) The essential part is that possible processing of personal data outside the Data Controller will not come as a surprise to the data subject]

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:

[ See, a list of (permanent) processors used by JYU [Data Processors for University of Jyväskylä | University of Jyväskylä (jyu.fi)](https://beta.jyu.fi/en/data-processors-for-university-of-jyvaskyla) and add here the processors you will use in the research. With other processors, a separate data processing agreement is needed [Contracts when processing personal data — Uno Staff Portal (jyu. fi)](https://uno.jyu.fi/en/help-centre/security-and-data-privacy/data_privacy/data-processing-agreement-and-other-relevant-agreement-templates/contracts-when-processing-personal-data) NextCloud, Moniviestin, and REDCap are hosted by the university and there are no data processors].

With other processors, a data processing agreement must be signed separately. NB! Researchers whom you have listed in the section “team members who process personal data” are not data processors. Only an individual outside the University of Jyväskylä community or (more frequently) another organization may be a data processor.

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.

1. **Other disclosure of personal data during research**

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

**Or**

Your data can be delivered during this research, for a purpose complying with the original purpose, to [specify the recipient or recipient group] when the processing of these data is based on public interest. In such cases, sufficient technical and organisational protective measures will be taken care of. If you wish, the research manager in charge will give you specific information about the source to whom your personal data has been disclosed.

*[INSTRUCTION: This section is possible in research where the lawful basis for the processing of personal data is public interest. Here, the purpose is to describe the delivery of personal data to recipients outside this research and the bodies involved in its implementation (Joint Data Controllers, processors of personal data). Such recipients denote data controllers to whom the data are delivered* ***for their research purposes deviating from those of this research (other scientific studies or statistics).*** *The actual recipients must be specified here (for example, University X) or at least the groups of recipients (for example, universities in Finland). Deliveries are possible only for purposes complying with the original purpose of the data collection, which in practice means scientific research or statistical purposes. Heeding the principle of fairness, the Data Controller must provide the data subjects with recipient data most relevant to them. In practice, this usually means specifying the recipients so that the data subjects get to know who is holding their personal data. If the Data Controller decides to announce recipient groups, related information should be as specific as possible, specifying the type of recipients (referring to their sphere of operation), field of activity, and location.* ***An example of delivering personal data during research:***“Identification data (a register of email addresses collected for a panel) will not be given at any stage to any third-party recipients outside the research team. Neither will the code key, i.e. a separate file to protect direct identification data of the subjects, be delivered to any third-party recipients. The research data (survey responses and interview transcripts) can be given, by permission of the principal investigator in charge, to other universities and researchers in Finland for scientific research on the grounds of public interest. When delivering such data, an agreement is made to bind the recipient to comply with responsible conduct of research, i.e. taking care of the anonymity of the interviewees and appropriate keeping and erasure of the data after the agreed usage.”*]*

If a reward or cost reimbursement is paid to the research subject, the payer discloses statutory information to the Incomes Register Unit for the Incomes Register without being hindered by confidentiality provisions and other restrictions on access to information (Act on the income information system 53/2018).

1. **Personal data to be processed in [add the name of the study]**

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 [e.g. social security number, name, email address, postal address, phone number, student ID, survey responses, audio records, interview notes, photos, videos, diaries, or other such material. Data collection is based on the research plan.

**[Select or omit]** For this research, we will also collect necessary data concerning you from other personal registers [the registers and the data collected from these need to be specified].

**[Select or omit]** You will be paid a reward and/or reimbursement of expenses for your participation in the study. For taxation purposes, your name, nationality, social security number, and address are needed. In case of monetary reward, a tax card is also needed. The payer reports the monetary reward and/or cost reimbursement to the Incomes Register. When the University of Jyväskylä pays a reward or cost reimbursement, the University will store your personal data for 10 years.

This research does not involve the processing of personal data of special categories.

**OR**

This research involves the processing of personal data of the following special categories or offenses and criminal records:

[ ] Race or ethnic origin

[ ] Political opinion

[ ] Religious or philosophical beliefs

[ ] Trade union membership

[ ] Genetic data

[ ] Processing of biometric data to uniquely identify a natural person

[ ] Health

[ ] Sexual behavior or orientation

[ ] Offences and criminal records

[INSTRUCTION: **Delete unnecessary items from the above list.**

**Add here how this** notice has been delivered to the data subject: e.g. ”This privacy notice is published on the website of the study and data subjects have received an electronic questionnaire including a direct link to this information”].

1. **The lawful basis for processing personal data in scientific research**

[INSTRUCTION: Select the appropriate grounds for the processing of personal data and delete any unnecessary sections. In the case of scientific research, the lawful basis for processing is **public interest; delete the other sections.** If a thesis cannot be regarded as a scientific study, the student can mainly use data subjects’ consent/specific consent as the lawful basis; the student must be able to protect the collected data. Discuss with your supervisor about the processing of personal data and your master's thesis as a scientific study.

There are separate provisions for the processing of personal data e.g. in the Medical Research Act (1999/488). If you request for your study an advance assessment from the health care district, select the grounds for processing from the section that refers to a health care district.]

[ ] Scientific research serving a public interest (GDPR, Article 6.1e, special personal data categories 9.2j)

[ ] Data subject’s consent (GDPR, Article 6.1a, special personal data categories 9.2a)

**Additional grounds**

[ ] Processing concerns special personal data categories, that the data subject has expressly made public (special personal data categories 9.2e)

[ ] Processing of personal data for journalistic, academic, artistic, or textual purposes (Data Protection Act, section 27)

**Research for which an advance assessment is requested from a healthcare district**

[ ]  Scientific research serving a public interest (GDPR, Article 6.1e, special personal data categories 9.2j)

[ ] Data subject’s consent and specific consent (GDPR, Article 6.1a, special personal data categories 9.2a)

[ ] General interest and a public interest related to the protection of public health (GDPR, Article 6.1e, special personal data categories Article 9.2i; Medical Research Act, section 21a)

[ ] Statutory obligation relative to reporting on safety and authoritative announcements (GDPR, Article 6.1c, special personal data categories 9.2i; Medical Research Act, section 21a)

1. **Transfer of personal data outside the EU/EEA area**

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

**[INSTRUCTION:** Transferring/delivering personal data outside the[EU/EEA countries](https://tulli.fi/en/about-us/our-activities/eu-eea-efta-and-schengen-countries) is possible only if certain prerequisites for protective measures are met. Specify a justification for the transfer in compliance with the GDPR. When necessary, contact tietosuoja@jyu.fi if you are planning for a transfer of personal data outside the EU/EEA area.]

*The destination country has got a decision by the EU Commission on the adequacy of data protection (GDPR, Article 45):* [*https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\_en*](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

*OR*

*The transfer agreement uses the Commission’s standard formulations (GDPR, Article 46.2), see* [*https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\_en*](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)]

OR

The transfer of personal data is based on the data subject’s specific consent [INSTRUCTION: Must be requested on the consent form for participation].

1. **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**

**[**INSTRUCTION**: Select and delete unnecessary sections.** [**Beforehand read carefully what personal data, anonymisation, and pseudonymisation mean.**](https://www.fsd.tuni.fi/en/services/data-management-guidelines/anonymisation-and-identifiers/#terms-to-understand) **]**

[ ] The data set is anonymised at the compilation stage (all identification data are fully removed so that there will be no return to the identifiable data and no new data can be connected to the data set).

[ ] As a protective measure, any direct identification data are removed upon the compilation of the data set (pseudonymised data allowing restored identification using codes or equivalent information, and also new data connected to the data set).

[ ] 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 data is analysed with direct identification data because (a justification for keeping the direct identification data):

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

 [ ]  user ID [ ] password [ ] registered use [ ] access control (physical spaces)

 [x] by other means, how: [INSTRUCTION: Read the guidelines for[Table of processing confidential information — Uno Staff Portal (jyu.fi)](https://uno.jyu.fi/en/help-centre/security-and-data-privacy/information_security/information-security-guides/table-of-processing-confidential-information/table-of-processing-confidential-information) [.](https://uno.jyu.fi/fi/ohjeet/turvallisuus-tietoturva-ja-tietosuoja/tietoturva/tietoturvaohjeet/salassa-pidettavan-tiedon-kasittely) Always describe verbally, instead of just checking the boxes, how the data are handled in terms of information security during the research.]

**[Select/delete unnecessary sections]**

For this study, a separate data protection impact assessment has been made **[READ** INSTRUCTION**:** [Risk assessment i.e. impact assessment for data protection— University of Jyväskylä (jyu.fi)](https://www.jyu.fi/fi/yliopisto/tietosuoja/tietosuojan-lomakkeet/riskiarvio-eli-tietosuojan-vaikutustenarviointi-tutkimukset/view). **An initial analysis is always necessary**.]

[ ]  Yes [ ]  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 [[JYU STAFF will need to complete online trainings at JYU]](https://uno.jyu.fi/en/wellbeing-and-learning/basic-skills-of-a-jyu-member)

[ ] Yes

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

[ ]  Yes

1. **Processing of personal data after *the research has ended***

**[Select and delete unnecessary sections. Read the guidelines for What the duration of research means** <https://www.jyu.fi/en/university/data-privacy/tietosuojaohjeet/researchers#autotoc-item-autotoc-8>**]**

[ ]  The research register will be deleted after the research has ended, approximately by month. year, or

[ ]  The research register will be anonymised after the study has ended, approximately by month.year. 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 or

[ ] The research register will be archived with identification data, i.e. including personal data, after the study has ended, approximately from month.year. [INSTRUCTION: Specify whether the archived data will include direct and/or indirect identification data, and as far as possible also the archiving location and whether the archiving will concern the whole data set or only some parts of it. **The JYU PI in charge has considered that the data set is so significant for research that it needs to be kept permanently in its identifiable form.** If the data set is archived with identification data because of its research value, the processing is based on public interest.]

**Lawful basis for archiving personal data included in research data after the study has ended**

Add or delete. You will choose this only if you are planning to archive personal data**.**

[ ]  Archiving of research data and cultural heritage material based on general interest (a research data set is archived after the study has ended and the archived material includes personal data), a value assessment is made for the material to be archived (GDPR, Article 6.1e, special personal data categories 9.2j).

1. **Rights of the data subject**

INSTRUCTION**: If you need to deviate in your study from the data subject rights described below, please contact the University’s Data Protection Officer before commencing the data collection. Deviating from data subject rights may require an impact assessment.**

***[Delete ”Cancellation of consent” if the lawful basis for processing is not consent]***

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.

***[Delete, ”Right to data portability” if the lawful basis for processing is not consent]***

Right to data portability (GDPR, Article 20)

You have the right to receive your submitted personal data in an organised, generally used, and machine-readable format, and also the right to transfer the data to another Data Controller if possible and processing takes place automatically.

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.

***[INSTRUCTION: Add if personal data will be archived on the grounds of public interest]***

***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 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 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.

[Delete or when necessary, replace with researcher’s /another instance’s information if JYU is not the Data Controller or a Joint Data Controller]

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.

INSTRUCTION: When necessary, add other contact person information for a joint data controllership context, and also the following text: “The organisations listed in Section 1 act as Joint Data Controllers in this research, so that they are jointly responsible for the lawful processing of personal data. Data subjects can make all requests regarding the use of data subject rights in this research to the following contact person: X ”

A data subject can use his or her data subject rights under the GDPR with relation to, and against each Data Controller. In such a case, the recipient will forward the request or demand also to the other Joint Data Controllers.

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>