



14.8.2025

## PRIVACY NOTICE– EARLY CHILDHOOD EDUCATION PROFESSIONALS

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 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**

The controller is responsible for the lawfulness of the processing of personal data in the study.

The controller of this study is: University of Jyväskylä, Seminaarinkatu 15, PO Box 35, 40014 University of Jyväskylä. Business ID 0245894-7. Data Protection Officer at the University of Jyväskylä: tietosuoja@jyu.fi, +358 40 805 3297.

### **Research managers**

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and

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

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 data. Further information on the persons involved can be obtained from the principal investigator.

### **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 processing 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 the investigation**

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

### **Personal data processed in the SITES study – Social inclusion and diversity in early childhood education and care**

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

The following personal data will be collected from you in the study: name, age, gender, email address, telephone number, nationality, country of birth, native language and languages spoken at home, religious or philosophical beliefs, educational background, occupational status, audio recording, video recording, interview notes. 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 subjects together with the research information sheet. Research consent forms are collected from participants mainly electronically using Redcap, but participants may also fill out a paper consent form if they wish, which will be stored in electronic form and destroyed in paper form.

### **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**

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

### **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 data 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 identifying information, as removing such information 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 courses.

- ☒ Yes

Agreements with research assistants and/or personal data processors ☒ Yes

### PROCESSING OF PERSONAL DATA AFTER THE END OF THE RESEARCH

The research register will be archived at the end of its 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 subject to a value assessment (Article 6.1 e of the General Data Protection Regulation, special categories of personal data 9.2.j).

### Rights of the data subject

#### Right of access to information (Article 15 of the General Data Protection Regulation)

You have the right to know whether your personal data is being processed and what personal data is being processed. You may also request a copy of the personal data being processed.

#### Right to rectification (Article 16 of the General Data Protection Regulation)

If there are inaccuracies or errors in your personal data being processed, you have the right to request that they be corrected or supplemented.

#### Right to erasure (Article 17 of the GDPR)

You have the right to request the deletion of your personal data in certain cases. However, you do not have the right to request the deletion of your data if doing so would prevent or significantly impede the purpose of processing in scientific research.

Right to restriction of processing (Article 18 of the GDPR)

You have the right to restrict the processing of your personal data in certain situations, such as if you dispute the accuracy of your personal data.

Derogation from rights

In certain individual cases, the rights described here may be deviated from on the grounds specified in the General Data Protection Regulation and the Finnish Data Protection Act, insofar as the rights prevent or significantly impede the achievement of scientific or historical research purposes or statistical purposes. The need to derogate from the rights is always assessed on a case-by-case basis. The rights may also be derogated from if the data subject cannot be identified or can no longer be identified.

Archiving

When personal data is processed for archiving purposes in the public interest, the data subject does not, as a rule, have the rights mentioned above or the right to object under Article 21 of the GDPR. The authenticity, reliability, and research value of archived materials would be compromised if the personal data contained in the materials were to be altered. The derogation from rights is based on Section 32 of the Data Protection Act and Article 17(3) of the GDPR.

Profiling and automated decision-making

Your personal data will not be used for automated decision-making in this study. The purpose of processing personal data in this 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.

Exercising the rights of the data subject

If you have any questions about the rights of data subjects, please contact the university's data protection officer. All requests concerning the exercise of rights should be submitted to the University of Jyväskylä Registry. Registry and Archives, PO Box 35 (C), 40014 University of Jyväskylä, tel. +358 40 805 3472, e-mail: kirjaamo(at)jyu.fi. Visiting address: Seminaarinkatu 15 C building (University main building, 1st floor), room C 140.

Reporting a data breach or suspected breach to the University of Jyväskylä

<https://www.jyu.fi/fi/yliopisto/tietosuojailmoitus/ilmoita-tietoturvaloukkauksesta>

You have the right to lodge a complaint with the supervisory authority in your country of residence or place of work if you believe that the processing of your personal data violates the EU General Data Protection Regulation (EU) 2016/679. In Finland, the supervisory authority is the Data Protection Ombudsman.

Current contact details for the Office of the Data Protection Ombudsman: <https://tietosuoja.fi/etusivu>