PRIVACY POLICY/NOTICE

FOR SCIENTIFIC RESEARCH

EU General Data Protection Regulation

Art. 13 and 14

Date: [date]

**[Send the completed privacy notice to the Registry Office of University of Lapland for archiving purposes: kirjaamo@ulapland.fi]**

**[If the personal data is collected directly from the participant (you may amend the text to be more suitable for your research):]**

**Information for participants of the research project “[*insert name of study*]”**

You are taking part in a scientific study conducted at the University of Lapland. This notice describes how your personal data will be processed in the study.

Participation in the study is voluntary. There will be no negative consequences for you if you choose not to participate in the study or if you withdraw from the study. For more information on your rights and how you can affect the processing of your personal data, please see the end of this notice.

**[If the personal data is collected elsewhere (you may amend the text to be more suitable for your research):]**

**Information about personal data processing in the University of Lapland research project“[*insert name of study*]”**

A research project in which personal data is processed will be conducted at the University of Lapland. The purpose of this notice is to provide information on the personal data that will be processed, the source of the data and how the data will be used in the study. For more information on your rights and how you can affect the processing of your personal data, please see the end of this notice.

# Data Controller

University of Lapland

Address: P.O. Box 122 (Yliopistonkatu 8), 96101 Rovaniemi, Finland

In most cases, the data controller is the University. The data controller may be the researcher in cases where the researcher is conducting the research as an individual rather than as a representative of the University. This may be the case in, for example, research conducted for a master’s thesis or dissertation research if the researcher is not employed at the University.

Contact person in matters concerning the project: *(the person the participants can contact in matters related to data protection in the project)*

Name:

Address:

Tel.:

E-mail:

*[If there are multiple controllers, please also list the other controllers]*

# Description of the study and the purposes of processing personal data

*Describe the purpose of processing, i.e. for what scientific research purpose the personal data is processed. Describe the study so that the participant understands how their data is processed.*

# Parties and their responsibilities in research collaboration

*This section can be deleted if there are no collaboration partners.*

*If the study is a collaboration between multiple organizations/departments please describe the roles and responsibilities of the parties.Regist*

# Principal investigator or research group

*Include the details of the principal investigator or research group responsible for the study.*

Name:

Address:

Tel:

E-mail:

# Contact details of the Data Protection Officer

The Data Protection Officer of the University of Lapland is Hannu Mikkola. You can reach him at tietosuoja@ulapland.fi.

# Persons processing personal data in the study

*List the persons or categories of persons that have the right to process the personal data during the course of the study. It is not necessary to provide a list of individuals, it is sufficient to mention categories (e.g., researchers and research assistants in [faculty], [department])*

# Name, nature and duration of the study

Name of the study: *[name]*

[ ]  One-time research [ ]  Monitoring study/longitudinal study

Duration of the processing of personal data:

*Include the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period.*

# Lawful basis of processing

Personal data is processed on the following basis, which is based on Article 6(1) of the General Data Protection Regulation:

*Choose one basis for each purpose of processing. If the processing of personal data has multiple purposes, and there are therefore multiple lawful bases of processing, list the applicable types of personal data in parenthesis after each basis you have chosen.*

 *In practice, the lawful basis of processing in scientific research is usually the participant’s consent or scientific or historical research purposes or statistical purposes carried out in the public interest. If you are not sure about the lawful basis, please contact the Data Protection Officer.*

[ ]  participant’s consent

[ ]  compliance with a legal obligation to which the controller is subject

[ ]  performance of a task carried out in the public interest or in the exercise of official authority vested in the controller:

[ ]  scientific or historical research purposes or statistical purposes

[ ]  archiving of research materials or cultural heritage materials

[ ]  legitimate interests pursued by the controller or by a third party

 description of the legitimate interest:

#  Personal data included in the research materials

*Include the data/types of data concerning the participant that will be collected and/or stored.*

#  Sensitive personal data

No sensitive personal data will be processed in the study.

*OR*

The following sensitive personal data will be processed in the study:

[ ]  Racial or ethnic origin

[ ]  Political opinions

[ ]  Religious or philosophical beliefs

[ ]  Trade union membership

[ ]  Genetic data

[ ]  Biometric data for the purpose of uniquely identifying a natural person

[ ]  Health

[ ]  A natural person’s sex life or sexual orientation

Sensitive data is processed on the following basis, which is based on Article 9(2) of the General Data Protection Regulation:

[ ]  Consent of the participant

[ ]  Scientific or historical research purposes or statistical purposes

[ ]  The sensitive data has been made public by the participant

[ ]  Other: *Please clarify*

[ ]  Persona data relating to criminal convictions and offences or related security measures will be processed in the study.

# Sources of personal data

*Describe the sources of the personal data that will be processed in the study.*

#  Transfer and disclosure of the personal data to third parties

*Describe whether the personal data will be transferred or disclosed to recipients outside the research group. What data is disclosed/transferred, for what purpose, what are the grounds for disclosure? Also describe any transfers of personal data that will be made to processors of personal data (e.g. subcontractors).*

#  Transfer or disclosure of personal data to countries outside the EU/European Economic Area

*Specify the legal grounds for transferring/disclosing personal data to recipients outside the EU/EEA, e.g. an adequacy decision made by the Commission, standard contractual clauses adopted by the Commission, binding corporate rules, Privacy Shield certificate, participant's explicit consent to the proposed transfer after they have been informed about the related risks. See chapter V of the General Data Protection Regulation (Articles 44–49).*

*If possible, include a link to the safeguard used or information on how the participants can receive information on such safeguard.*

***The most common safeguard is the standard data protection clauses adopted by the Commission*** *(Article 46(2) of the GDPR), 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)*. The clauses should be used as the primary legal grounds for transfer to countries outside the EU/EEA that do not have an adequacy decision made by the Commission.*

#  Automated decisions

No automated decisions are made.

*Typically, no automated decisions (such as profiling) which produce legal effects or similarly significant effects concerning the participant are made in scientific research. If such decisions are made, please contact the Data Protection Officer.*

#  Safeguards to protect the personal data

[ ]  The data is confidential.

Protection of manual material:

Personal data processed in IT systems:

 [ ]  username [ ]  password [ ]  logging [ ]  access control

 [ ]  other: *(please specify)*

Processing of direct identifiers:

[ ]  Direct identifiers will be removed in the analysis phase

[ ]  The material to be analyzed includes direct identifiers. Reason: *(reason for retention of direct identifiers*

#  Processing of personal data after the completion of the study

[ ]  The research material will be deleted

[ ]  The research material will be archived:

[ ]  without identifiers [ ]  with identifiers

Where will the material be archived and for how long: \_\_\_

#  Your rights as a data subject, and exceptions to these rights

The contact person in matters concerning the rights of the participant is the person mentioned in section 1 of this notice.

**Rights of data subjects**

According to the General Data Protection Regulation (GDPR), data subjects have the right

* of access to their data
* to rectification of their data
* to the erasure of their data and to be forgotten
* to restrict the processing of their data
* to data portability
* to object to the processing of their data
* not to be subject to a decision based solely on automated processing.

Not all of these rights can be exercised in all situations, depending on factors such as the basis for the processing of personal data.

For more information on the rights of data subjects in different situations, please see the Data Protection Ombudsman’s website: <https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>

**Exceptions to data subject rights**

Under the General Data Protection Regulation and the Finnish Data Protection Act, certain exceptions to the rights of data subjects can be made when personal data is processed in scientific research and fulfilling the rights would render impossible or seriously impair the achievement of the objectives of the processing (in this case, scientific research).

The need to make exceptions to the rights of data subjects will always be assessed on a case by case basis. It is likely that exceptions to the following rights will be necessary in this study:

[ ]  Right of access (GDPR Article 15)

[ ]  Right to rectification (GDPR Article 16)

[ ]  Right to erasure (GDPR Article 17)

[ ]  Right to restriction of processing (GDPR Article 18)

[ ]  Right to data portability (GDPR Article 20)

[ ]  Right to object (GDPR Article 21)

Reason for the exceptions: [*Fill in the reason here. Examples of situations in which some data subject rights cannot be fulfilled:*

* *It is not possible to erase or limit the processing of data concerning a single participant without unreasonable effort*
* *Erasing or limiting the processing of data concerning a single participant would jeopardize the research*]

**Right to lodge a complaint**

You have the right to lodge a complaint with the Data Protection Ombudsman’s Office if you think your personal data has been processed in violation of applicable data protection laws.

Contact details:

Data Protection Ombudsman’s Office (Tietosuojavaltuutetun toimisto)

Address: Ratapihantie 9, 6th floor, 00520 Helsinki

Postal address: B.O. Box 800, 00521 Helsinki

Tel. (switchboard): 029 56 66700

Fax: 029 56 66735

E-mail: tietosuoja(at)om.fi