PRIVACY NOTICE

FOR SCIENTIFIC RESEARCH

EU General Data Protection Regulation

**Date: [DATE]**

**Description of the Research and the Purposes of Processing Personal Data**

[description of the research]

This notice describes how your personal data will be processed in the research.

Participation in the research is voluntary. There will be no negative consequences for you if you refuse to participate in the research or if you withdraw from the research at any time. If you decide to withdraw from the research, the data collected before the withdrawal can still be used in the research. For more information regarding your rights and how you can affect the processing of your personal data, please see the end of this notice.

# **Data Controller**

[your organisation name]

Address: [organisation address]

Contact person in matters concerning the project:

Name: [your organisation name]

Address: [address]

Tel.:[number]

E-mail: [e-mail]

1. **Description of the research and the purposes of processing personal data**

[Description of the research project, the research data and the purpose of the processing of personal data]

Each participant to this research will be provided with a) a brochure containing information of the project and its aims, b) this privacy policy notice either as a physical or a digital copy.

1. **Parties and their responsibilities in research collaboration**

[*Describe the parties involved in the research (by name, if possible) and their responsibilities, as well as who processes or has access to the personal data. Delete this instruction]*

Participants may address any request to exercise their rights as data subjects in relation to this research to the contact person below:

Name: [name]

Address: [address]

Tel.: [number]

E-mail: [e-mail]

If necessary, the contact person above can also relay the request to other organisations (joint controllers) participating in this research.

1. **Research group and its Principal Investigator**

Research group: [name]

Name: [name]

Address: [address]

Tel.: [number]

E-mail: [e-mail]

[Alternatively, delete the fields and enter the required information directly as text, delete instruction]

1. **Contact details of the Data Protection Officer**

The Data Protection Officer of the Lapland University Consortium is lawyer Jari Rantala. You can contact him at tietosuoja@ulapland.fi.

# **Persons processing personal data in the research**

The research project will be carried out by the project researchers by [Names of researchers/research organisations]. In addition to the researcher(s) mentioned in Section 3 of this document ("Parties and their responsibilities in research collaboration"), the pseudonymised and anonymised data may also be used by: 1) any other researchers, doctoral candidates, thesis authors (bachelor and master thesis authors), research assistants if approved by the principal investigator; 2) other researchers, research assistants, or other research staff involved in the research, publication of research results, or reporting of the project. All persons who process the data have to sign a Data Use Agreement and a Confidentiality Agreement, and agree to comply with the guidelines of the Data Management Plan, Data Protection Guidelines of the Universities, and the ethical principles of research with human participants.

[Describe the person(s) who process personal data. Delete this instruction].

# **Name, nature and duration of the research**

Name of the research: [name]

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

Duration of the processing of personal data: [Explain the duration of processing].

At the end of the research, all personal information will be deleted using secure and private methods described in this notice.

# **Legal basis for processing**

Personal data are processed in compliance with the Article 6(1) of the General Data Protection Regulation:

[In practice, in scientific research, the basis for processing is almost always either the consent of the subject or scientific or historical research in the public interest. If you are not sure about the legal basis of the data processing, please contact the Data Protection Officer. Delete this instruction]

[ ]  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: [explain]

[Mark the required number of legal grounds and delete the extra ones, delete this instruction.]

# **Personal data included in the research materials**

[What data do you collect? What other categories of personal data may be collected in connection with the processing?]

# **10. Sensitive personal data**

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

[ ]  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

[Mark the required number of legal grounds and delete the extra ones, delete this instruction.]

The processing of special categories of personal data can be done only in accordance with the art. 9(2) of GDPR. i.e. 1) based on explicit consent of data subject and 2) when processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the GDPR and based on Union or Finnish law.

# **11. Sources of personal data**

[What is the source of the data?]

# **12. Transfer and disclosure of personal data to third parties**

[Is the processing of personal data carried out by an external service provider or is the data handed over for archiving, for example to Data Archive Aila? Data Processing Agreements usually have to be concluded with external parties. In these situations, please contact the Data Protection Officer]

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

No personal data will be transferred or disclosure outside of the areas of the European Union or the European Economic Area.

[Please contact the Data Protection Officer if data is transferred outside the EU/EEA. Delete this instruction]

# **14. Automated decisions**

No automated decisions are made.

[Scientific research does not usually involve automated decisions (e.g. profiling) that may have legal or other significant effects on data subjects. However, if this is the case, please contact the Data Protection Officer. Delete this instruction.]

# **15. Safeguards to protect personal data**

[ ]  The data is confidential.

**Protection of manual material:**

Research participant(s) consent forms are securely digitised and stored on an encrypted disk drive(s) and/or memory stick(s) by the researcher(s) at [name of your organisation]. The pseudonymised survey data will be stored on password and username protected computers and, if necessary, on back-up encrypted hard drives and/or memory sticks. In case of data exchange between researcher(s), for example, due to co-authorship or other such reasons, the data will be sent through [name of your organisation] and Funet's secure proxy server. In case of data exchange with researchers outside of the [name of your organisation], the data exchanged will always be anonymised.

[Explain the principles of personal data protection. How is personal data protected? Delete this instruction]

Personal data processed in IT systems:

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

 [ ]  other: [specify here]

Processing of direct identifiers:

[ ]  Direct identifiers will be removed in the analysis phase

[ ]  The material to be analyzed includes direct identifiers. Reason: [specify here]

# **16. Processing of personal data after the completion of the research**

[ ]  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: EXAMPLE: Upon the termination of the project (see point. 7.), the data, without personal information(s) of the participants or other identifiers, can be archived to the Finnish Social Science Data Archive Aila. The access and rights to data and use thereof remains with the principal investigator of this project.

# **17.** **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 privacy notice.

**Rights of data subjects**

Right to withdraw your consent (GDPR, art. 7)

You have the right to withdraw your consent if the processing of your personal data is based on consent. Withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

Right of Access (GDPR, art. 15)

You have the right to know whether your personal data are processed in the research and which of your personal data are processed in the research. You may also request a copy of the personal data processed, if you wish.

Right to Rectification (GDPR, art. 16)

If there are inaccuracies or errors in the personal data processed, you have the right to request their correction or completion.

Right to Erasure (GDPR, art. 17)

You have the right to request the erasure of your personal data in the following cases:

1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
2. you withdraw the consent on which the processing is based and where there is no other legal ground for the processing;
3. you object to the processing (see below for a description of this right) and there are no overriding legitimate grounds for the processing;
4. the personal data have been unlawfully processed; or
5. the personal data have to be erased for compliance with a legal obligation under Union or Member State law to which the controller is subject.

However, there is no right to erasure if the erasure would prevent or seriously undermine the purpose of the processing for the purposes of scientific research.

Right to Restrict Processing (GDPR, art. 18)

You have the right to restrict the processing of your personal data in any of the following circumstances:

1. you contest the accuracy of the personal data, in which case the processing shall be limited for a period of time within which the [your organization name] can verify the accuracy of the personal data;
2. the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
3. the [your organization name] no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims
4. you have objected to the processing of personal data (see below for more details), pending verification of whether the controller's legitimate grounds override those of the data subject.

Right to Data Portability (GDPR, art. 20)

You have the right to receive the personal data you have provided to the [your organization name] in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without the [your organization name]'s hindrance, where the legal basis for the processing is consent or a contract, and the processing is carried out automatically. If you use your right to transfer data portability, you have the right to have the personal data transferred directly from one controller to another, where technically possible.

Right to Object (GDPR, art. 21)

You have the right to object the processing of your personal data if the processing is based on a public interest or a legitimate interest. In this case, the [your organization name] may not process your personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or where it is necessary for the establishment, exercise or defense of legal claims. The [your organization name] may also continue to process your personal data where it is necessary for the performance of a task carried out in the public interest.

Exceptions to rights

The rights described in this paragraph may be derogated from in certain individual cases on the grounds defined in the General Data Protection Regulation and the Finnish Privacy Legislation to the extent that these rights prevent or greatly hinder the achievement of a scientific or historical research purpose or a statistical purpose. The need to derogate from the rights will always be assessed on a case-by-case basis.

**Right to lodge a complaint**

You have the right to submit lodge a complaint with the Data Protection Ombudsman’s Office if you think your rights have been breached.

Contact details:

**Data Protection Ombudsman’s Office (Tietosuojavaltuutetun toimisto)**

Link: [Notification to the Data Protection Ombudsman](https://tietosuoja.fi/en/notification-to-the-data-protection-ombudsman)

Visiting address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: P.O. Box 800, 00531 Helsinki, Finland

E-mail: tietosuoja(at)om.fi

Switchboard: +358 (0)29 566 6700

Registry: +358 (0)29 566 6768

THIS FORM MUST ALSO BE COMPLETED AND SUBMITTED TO THE REGISTRY. (kirjaamo@ulapland.fi)