



Information for Research Participants

You are about to take part in a scientific study organised by the Research Foundation for Studies and Education Otus sr. This notice describes how your personal data will be processed during 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. However, if you withdraw from the study, data collected prior to your withdrawal may still be used in the study. For more information on your rights, please see section 13 of this notice.

This Privacy Policy can be updated during the study if necessary.

1. Data Controller

Research Foundation for Studies and Education Otus sr
Address: Lapinrinne 2, 00180 Helsinki

The Data Protection Officer of the Research Foundation for Studies and Education Otus:
tietosuoja@otus.fi

Contact person in matters concerning the study:
Name: Tuukka Salminen
Email: tuukka.salminen@otus.fi

2. Name, nature and duration of the study

Name of the study: Multiple rights to study

This is a one-time study. The study consists of two parts: a written part followed by a survey. The study will run until the summer 2019. The research material will be collected and processed 2–5/2019.

3. Description of the study and the purposes of processing personal data

The purpose of this research project is to study past and present university students who have multiple rights to study. The rights to study of the participants' do not have to be valid, and the participants may have completed all or some of their studies e.g. by graduating or by giving up their right to study. The study will offer new information about the backgrounds of university students and the reasons why people have several rights to study at higher education institutions.

In the second part of the study we will collect personal data from the participants (see section 6) which may make it possible to identify people indirectly. These details will only be used as background information for the study, and the participants cannot be identified in the research report.

During the project we will also collect personal and contact details of participants for a prize draw. These details will not be used as part of the research and they will be destroyed as soon as the draw has been completed, or at the latest when the study is completed.

4. Responsible project leader and research team

Mila Hakanen, CEO of Otus, acts as responsible project leader. She can be reached via email toiminnanjohtaja@otus.fi and by phone 050 345 4024.

Researchers at Otus who have been assigned for the project are in charge of carrying out the study. Only those of Otus' researchers who have been assigned to the project have access to the survey material and the personal data register which is based on the survey.

5. Law basis of processing

The processing is based on the consent of the research participants (EU General Data Protection Regulation, art. 6, paragraph 1).

6. Personal data included in the research material and sensitive personal data

During the study, in addition to gender and year of birth, we will also ask you questions relating to your study background, which may make it possible to identify you indirectly. The individual pieces of data will not directly reveal your identity, but together the data might convey your identity to the researchers. Data that will be collected:

- secondary degree, year of graduation, place of residence when graduating from secondary education
- the higher education institution, field, degree/degree programme, the year you began studying, method of admission and details on the completion of your degree for your first place of study
- the higher education institution, field, degree/degree programme, the year you began studying, method of admission and details on the completion of your degree for your second place of study
- the higher education institution, field, degree/degree programme, the year you began studying and details on the completion of your degree for your potential third and fourth place of study
- your rights to postgraduate study in Finland and right to study for an exam at a higher education institution abroad.

You may also provide details in the open fields that may make it possible to identify you, e.g. details about your place of residence or place of work.

At the end of the questionnaire you will be asked whether or not you want to participate in the prize draw, and naturally your contact details can act as direct identification data. These details will, however, never be connected to the answers you have provided, and the personal data file which is created as part of the draw will be deleted after the draw, when the study is completed at the latest.

No sensitive personal data will be collected or processed during the study.

7. Sources of personal data and combining personal data from different sources

In the study we will collect personal data via the survey with your consent, and it is voluntary to provide information by answering the questions. The information you provide will not be combined with any other material or personal data relating to you. In the study, we will only process the personal data that you have provided in this specific survey, and only in the manner described in this description.

8. Transfer or disclosure of data outside the research group

Your personal data will never be disclosed to external parties.

9. Transfer or disclosure of data to countries outside the EU or the European Economic Area

Your personal data will not be disclosed outside the EU/EEA.

10. Automated decision-making and profiling

No automated decisions are made.

11. Safeguards to protect the personal data

The data collected during the study will be processed confidentially in the manner set out by data protection legislation. You cannot be identified from the results, reports or publications relating to the study. The following safeguards will be used to protect the personal data:

- When the personal data is no longer required in order to carry out the research or confirm the results, the research material will be deleted, archived or transformed into a format where the research participant cannot be identified.
- The data which is processed in the data systems are protected by user identification.
- The hard copies of the material are stored in locked premises that can only be accessed by relevant parties.

12. Processing of personal data and research data after the completion of the study

After the study has been completed the research data will be archived at the Finnish Social Science Data Archive without any identification data so that no individual participants can be identified in the material. The anonymised data will be retained for researchers' use, and also disclosed to the National Union of University Students in Finland for deeper analysis.

The survey contains a separate question asking for your consent to the material being archived and used by third parties. If you so wish, you may participate in only this study, and the details you have provided will not be used for other purposes without your consent.

The material containing identification data will be deleted when the data is no longer required in order to disclose or verify the anonymised material.

13. 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.

Withdrawing consent (GDPR Article 7)

You have the right to withdraw your consent, provided that the processing of the personal data is based on consent. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Right of access (GDPR Article 15)

You have the right to obtain information on whether or not personal data concerning you are being processed in the project, as well as the data being processed. You can also request a copy of the personal data undergoing processing.

Right to rectification (GDPR Article 16)

If there are inaccuracies or errors in your personal data undergoing processing, you have the right to request their rectification or supplementation.

Right to erasure (GDPR Article 17)

You have the right to request the erasure of your personal data on the following grounds:

- a) The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- b) You withdraw the consent on which the processing was based, and there are no other legal grounds for the processing.
- c) You object to the processing (the right to object is described below), and there are no justified grounds for the processing.
- d) The personal data have been unlawfully processed, or
- e) The personal data must be erased to comply with a legal obligation in Union or Member State law to which the controller is subject.

The right to erasure does not apply if the erasure of data renders impossible or seriously impairs the achievement of the objectives of the processing in scientific research.

Right to restriction of processing (GDPR Article 18)

You have the right to restrict the processing of your personal data on the following grounds:

- a) You contest the accuracy of the personal data, whereupon the processing will be restricted for a period enabling the Research Foundation for Studies and Education Otus to verify their accuracy.
- b) The processing is unlawful, and you oppose the erasure of the personal data, requesting the restriction of their use instead.
- c) Otus no longer needs the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims.
- d) You have objected to processing (see details below) pending verification of whether the legitimate grounds of the controller override those of the data subject.

Right to data portability (GDPR Article 20)

You have the right to receive the personal data you have submitted to Otus in a structured, commonly used and machine-readable format and have the right to transmit these data to

another controller without hindrance from Otus, provided that the processing is based on consent or a contract, and the processing is carried out by automated means.

When exercising your right to data portability, you have the right to have your personal data transmitted from one controller to another, where technically feasible.

Right to object (GDPR Article 21)

You have the right to object to processing your personal data, provided that the processing is based on the public interest or legitimate interests. Otus will no longer have the right to process your personal data unless it can demonstrate compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject, or unless it is necessary for the establishment, exercise or defence of legal claims. Otus can continue processing your personal data also when necessary for the performance of a task carried out for reasons of the public interest.

Derogating from rights

In certain individual cases, derogations from the rights described here may be made on the basis of the GDPR and the Finnish Data Protection Act, insofar as the rights render impossible or seriously impair the achievement of scientific or historical research purposes or statistical purposes. The need for derogations will always be assessed on a case-by-case basis.

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 information:

Data Protection Ombudsman's Office (Tietosuojavaltuutetun toimisto)
Address: Ratapihantie 9, level 6, 00520 Helsinki
Postal address: P.O. Box 800, 00521 Helsinki
Switchboard: 029 56 66700
Email: tietosuoja(at)om.fi