



**PRIVACY POLICY/NOTICE
FOR SCIENTIFIC RESEARCH
EU General Data Protection Regulation
Issue date: 09/09/2020**

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 and ordered by Aalto University Student Union (AYY). 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, tel. 050 367 7259

Contact person in matters concerning the study:

Name: Aino Suomalainen

Phone: 050 570 6316

Email: aino.suomalainen@otus.fi

2. Name, nature and duration of the study

Name of the study: AYY's Member survey 2020

The research project provides Aalto University Student Union (AYY) with information on the opinions and experiences of its members. The research is conducted as a survey. The survey is conducted with an electronic survey form in the autumn of 2020. The final report of the study will be given to AYY, which will use the results for developing its activities.

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

AYY's member survey intends to clarify the members' experiences and opinions about the necessity and quality of services and the related communications. The survey provides valuable information to support the development of the student union and university activities. The survey responses will be used in student advocacy and the development of AYY's activities.

Data collection is carried out through a survey sent to the target group by e-mail. The survey

is sent to the respondents using AYY's member register. AYY is responsible for sending the survey and the contact information of the respondents will not be passed on to Otus under any circumstances. However, the respondent may provide contact information when signing up for the draw.

In the survey 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 reports or publications.

As part of the study we will also be collecting the participants' personal and contact details for a prize draw. The details provided for the prize draw will not be used for the study itself, and they will not be connected to the survey answers. The contact details will be deleted as soon as the prize draw has been completed or latest when the study ends.

Before anonymizing the research data, 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. This data will never be disclosed to parties outside Otus.

A final report will be made from the results of research analysis for internal purposes of AYY. The survey data can also be used to make reports, scientific articles and presentations in separate research projects, so that an individual respondent cannot be identified.

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.

Otus researchers appointed to the project are responsible for carrying out AYY's Member survey research.

5. Law basis of processing

The grounds for processing personal data in accordance with article 6 of the General Data Protection Regulation is the public interest for scientific research (6e) and the consent of the data subject (6a).

6. Personal data included in the research material and special personal data groups ('sensitive personal data')

In the research survey you have been asked following information 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:

- Year of birth
- Gender

- Mother tongue
- Working/studying
- Finnish citizenship
- School
- Field of study
- The year you began your current studies
- Current study phase
- Postal code

You may also provide details in the open fields that may make it possible to identify you indirectly.

At the end of the survey you will be asked whether you would like to take part in the prize draw. Naturally your contact details can be direct identifiers. These information will not be combined with the other answers you have given. The contact details will be deleted as soon as the prize draw has been completed or latest when the study ends.

In this study we will also collect and process the special personal data groups (sensitive personal data) listed below with the participants' permission (General Data Protection Regulation, article 9, paragraph 2a):

- X Race or ethnic origin
- X Social, political or religious beliefs or trade union membership
- X Health, illness, disability or treatment
 - X Sexual orientation
- Criminal act, punishment or other sanction
- Need of social services or having previously partaken in social services, support services and other benefits

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

We have received your contact information for the research from the AYY student register, and the information has not been disclosed outside AYY. Otherwise, your personal information will be collected through the survey form with your own consent. Providing information by responding to the questions is voluntary. The information you provide will not be linked to any other data or personal information concerning you. The research will therefore only address the personal data you have provided with the specific survey form and only in the manner mentioned in this privacy policy. The information you provide in the survey form cannot be linked to the contact information you provide for the draw.

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 data will not be disclosed outside the EU or 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. 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 systems are protected by user identification, and only the researchers which have been appointed to the study have access to it.
- The hard copies of the material are stored in locked premises that can only be accessed by relevant parties.
- The results will be presented without any identification data or in an anonymised form.

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

Anonymized research data which has been collected will remain at Otus, and in future years it can be used in our various research and development projects. The data will be stored safely on Otus' password-protected electronic network drive. The anonymised survey data is distributed to AYY for more detailed analyses and archived in the Finnish Social Science Data Archive for the use of other researchers with respondent's consent. Consent to the release and archiving of the data as well as the subsequent use of the implementing parties will be requested separately in the survey form.

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