



**PRIVACY POLICY/NOTICE  
FOR SCIENTIFIC RESEARCH  
EU General Data Protection Regulation  
Issue date: 20/04/2021**

## **Information for Research Participants**

You are about to participate in a study conducted by the Research Foundation for Studies and Education Otus and commissioned by the University of Applied Sciences Students in Finland SAMOK. 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 contact person for data protection of the Research Foundation for Studies and Education Otus:  
[tietosuoja@otus.fi](mailto: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](mailto:aino.suomalainen@otus.fi)

### **2. Name, nature and duration of the study**

Name of the study: JOKA project

The JOKA project started in 2020 and will continue in the spring of 2021. In the spring of 2021, survey data will be used for a study which is part of the third stage of the JOKA project.

The JOKA project survey is a cross-sectional study. The survey will be carried out through an electronic questionnaire in April-May 2021. The results of the analysis will be submitted to SAMOK in May-June 2021.

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

The survey is part of a SAMOK project entitled “Challenges to the community of universities of applied sciences posed by continuous learning and internationalisation (the JOKA project)”. The

goal of the JOKA project is to include different student groups as part of the university community by making sure different types of students and their needs and life situations are considered. The JOKA project was launched in 2020. In the spring of 2021, the goal of the JOKA project is to develop and to spread good practices for building a sense of community with the help of a survey, group interviews and workshops. The survey seeks to understand the effects of the coronavirus pandemic on the sense of community among students and the organising of events at universities of applied sciences. The target group for the survey is students and student union actors at universities of applied sciences.

As a result of the study, identified good practices can be further improved and spread in order to better integrate atypical student groups and to provide better services.

More information about the project: <https://samok.fi/joka-projekti-2020/>

The data collection will be implemented via an open link. SAMOK is responsible for sending out the questionnaire by sharing the invitation to the survey via their own channels to student union actors, who will then share the questionnaire in their own target group networks. Otus will at no point have access to respondents' contact details.

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.

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.

The results of the analysis will be compiled into a report for SAMOK, which may publish them. In addition, anonymised survey data may be used with the consent of the respondent in future Otus research and development projects.

#### **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](mailto:toiminnanjohtaja@otus.fi) and by phone 050 345 4024.

The JOKA project will be carried out by assigned Otus researchers, all of which have the right to process data in the study register.

#### **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
- The year you began your current studies
- University of applied sciences
- Type of education
- Level of education
- Field of education
- Dependent children in household
- The region of student union
- Participation in student union activities

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

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**

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.

## **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