

## General Data Protection Regulation (GDPR, 679/2016) Articles 12-14, 30

UNIVERSITY OF JYVÄSKYLÄ

PRIVACY NOTICE TO RESEARCH SUBJECTS

15. March 2022

Dear research participant,

We invite you to participate in our Education in Finland (EIF) study. Participation is voluntary; you do not have to do so, and you can withdraw from the study at any time. This notice describes the study and related processing of your personal data. The study is scheduled to be finished by 31 December 2022.

The processing of your personal data for this study is necessary according to the Data Protection Act (Chapter 4, section 3), because we are investigating students' action in an online environment and will use the information for pedagogical development. The use of personal data for pedagogical development is also based on the University's legal obligations (GDPR, Article 6, section 1c). We ask for your consent to participate in this study, which draws on data gained from student registrations and the learning environment.

### 1. BACKGROUND AND PURPOSE

This study explores **a) what kinds of feedback students give b) what kind of study experiences they have from the courses of Education in Finland, and c) what kind of answers do the students give to the open-ended questions and group discussions of the course assignments.** All responses will be treated anonymously.

The research data will be collected from the Education in Finland MOOC modules coordinated by the JYU Open University and Faculty of Education and Psychology. Students will take the MOOCs in an Online courses learning environment, the log data of which is saved for research purposes. The data controller will combine the log data with student registration data for the study module as well as course task responses. After this, the research data will be pseudonymised, i.e. removing any direct identification information for the sake of privacy protection. Consequently, the identity of individual participants can no longer be recognised from the data. The data will be analysed by various statistical methods.

We ask for your consent for your participation in this study and for combining your registration data in the Online learning environment.

Your data will be used for pedagogical development and scientific research. The processing of these data will not have any influence on assessing you as a student.

## 2. Possible benefits and disadvantages of the study to the research subjects

Drawing on research results, it is possible to develop online teaching and study counselling as well as methodology for learning-related analytics. Participation in this study does not involve any disadvantages to the research subjects.

## 3. RESEARCH OUTCOMES

The planned outcomes of this research include doctoral dissertations, scientific publications, conference and seminar papers, and practical applications. The research results will not be separately delivered personally to the research subjects.

## 4. RESEARCH COSTS AND FINANCIAL ACCOUNTS

Participation in this study does not bring any costs to the research subjects.

## 5. KEEPING AND ARCHIVING OF PERSONAL DATA

### **Keeping**

The register will be kept with password protection on a protected online drive of the University of Jyväskylä. The register will be erased immediately after the study has ended.

### **Archiving**

Archiving takes place after the study has ended and the data are no longer used for their original purpose. The data will be archived as anonymised to the Data Archive for Scientific Research (<https://www.fsd.uta.fi/fi/>). ;

## 6. DATA CONTROLLER AND RESPONSIBLE BODIES FOR THE STUDY

## **Data controller**

University of Jyväskylä, Seminaarinkatu 15, P.O. Box 35, 40014 University of Jyväskylä. exch. + 358 14 260 1211, Business ID 0245894-7. Data Protection Officer of the University of Jyväskylä: tietosuoja@jyu.fi, tel. + 358 40 805 3297.

## **Responsible research team**

University Teacher Ari Kiviniemi, +358408054649, [ari.m.kiviniemi@jyu.fi](mailto:ari.m.kiviniemi@jyu.fi), P.O. Box 35, 40014 University of Jyväskylä; University Teacher Liisa Kytölä, +35840 576 7769, [liisa.kytola@jyu.fi](mailto:liisa.kytola@jyu.fi), P.O. Box 35, 40014 University of Jyväskylä; Customer Relationship Manager, University Teacher Tiina Lämsä +358408053129, [tiina.al.lamsa@jyu.fi](mailto:tiina.al.lamsa@jyu.fi), P.O. Box 35, 40014 University of Jyväskylä; University Teacher Minna Nykopp, +358441904463, [minna.e.nykopp@jyu.fi](mailto:minna.e.nykopp@jyu.fi), P.O. Box 35, 40014 University of Jyväskylä.

## **Contact person(s)**

PhD Tiina Lämsä, +358408053129, [tiina.al.lamsa@jyu.fi](mailto:tiina.al.lamsa@jyu.fi); MSc Ari Kiviniemi, +358408054649, [ari.m.kiviniemi@jyu.fi](mailto:ari.m.kiviniemi@jyu.fi), M.A.(Educ) Liisa Kytölä, +35840 576 7769, [liisa.kytola@jyu.fi](mailto:liisa.kytola@jyu.fi), M.A.(Educ) Minna Nykopp,+358441904463, [minna.e.nykopp@jyu.fi](mailto:minna.e.nykopp@jyu.fi)

## **Research personnel**

The processors of personal data are contracted by the University of Jyväskylä. For further information about the personnel, please contact the leader of the research project.

Delivery of personal data: Personal data will not be delivered to any third party.

Transfer of personal data outside the EU/EEA area and appropriate protective measures thereof: There will be no such transfers.

## **7. DATA SUBJECT RIGHTS**

A research subject can lodge a complaint with the Office of the Data Protection Ombudsman, if he/she considers that the processing of his/her personal data has violated valid data protection legislation. (Read more: <http://www.tietosuoja.fi>).

## **Right to access your personal data (GDPR, Article 15)**

You have the right to obtain information about whether your personal data are processed, and which personal data are processed. If you wish, you can request a copy of the processed personal data.

### **Right to rectification (GDPR, Article 16)**

If your personal data to be processed include inaccuracies or errors, you have the right to have those corrected or supplemented.

### **Right to erasure (GDPR, Article 17)**

You have the right to request your personal data to be erased in certain situations. However, the right to erasure can be denied, if the erasure would prevent or severely hinder fulfilling the purpose of processing in scientific research.

### **Right to restriction of processing (GDPR, Article 18)**

You have the right to restrict the processing of your personal data in certain situations, e.g. if you deny the accuracy of your personal data.

### **Right to object the processing (GDPR, Article 21)**

You have the right to object to the processing of your personal data, if processing is based on public or legitimate interest. In such a case, the University cannot process your personal data, unless it can prove that processing is based on an essentially important and justified reason which supersedes your rights in this respect.

### **Derogation from the data subject rights**

Derogation from the aforementioned rights is possible in certain individual situations on the basis of the GDPR and the Finnish data protection act, insofar as the rights would prevent or severely hinder the fulfilment of scientific or historical research or statistical purposes. The need for derogation must always be assessed separately in each situation.

### **Profiling and automated decision making**

In this study, your personal data will not be used for automated decision making. In this study, the purpose of the processing of personal data is not to assess your personal characteristics, i.e. profiling.

Instead, your personal data and general qualities will be assessed from the perspective of broader scientific research.

### **Applying data subject rights**

If you have any questions about your data subject rights, you can contact the University's Data Protection Officer. All requests concerning data subject rights should be submitted to the Registry Office of the University of Jyväskylä. Registry Office and Archive, P.O. Box 35 (C), 40014 University of Jyväskylä, tel. + 358 40 805 3472, email: kirjaamo@jyu.fi. Street address: Seminaarinkatu 15, Building C (University Main Building, 1st floor), Room C140.

### **Data breach notifications (also for suspected cases) to the University of Jyväskylä**

<https://www.jyu.fi/fi/yliopisto/tietosuojailmoitus/ilmoita-tietoturvaloukkauksesta>

You have the right to lodge a complaint with a supervisory authority, especially with the supervisory authority of your permanent place of residence or employment, if you consider that the processing of your personal data is in breach of the General Data Protection Regulation (EU 2016/679). In Finland, the supervisory authority is the Data Protection Ombudsman.

### **Office of the Data Protection Ombudsman**

Ratapihantie 9, 6th floor, 00520 Helsinki, P.O. Box 800, 00521 Helsinki

exch.: +358 29 566 6700

email (Registry): tietosuoja@om.fi

## **8. PROTECTION OF PERSONAL DATA**

The research data and results are treated confidentially in compliance with data protection legislation. Your personal data cannot be identified from the research outcomes, reports or publications.

In the research outcomes and other documents, the research subjects are referred to by means of identification codes only. The key to these identification codes, which enables matching your personal data with respective identification codes, is kept safe in terms of information security, and it will be erased once the study is finished. The research data is stored in line with the information security practices for the handling of research data at the University of Jyväskylä.