The privacy notice informs research participants about the processing of their personal data as required by the General Data Protection Regulation. The privacy notice must be written in plain language and be comprehensible to the research participants, and it must be provided to the participants before the processing of personal data.

In this template, the sections to be filled out are marked with yellow highlighting, and the instructions are marked in pink. Before the privacy notice is given to the research participants, all yellow sections must be filled out, and after completing the notice, the pink instructional sections should be removed   
by for example, click “UTU-Sisennetty” with the right mouse button in the “Styles” menu   
→ then from the drop-down list click "Select All"   
→ then press the keyboard's delete key

**Privacy Notice for the [Add research name/title] Research**

You are participating in a scientific research study at the University of Turku. This privacy notice explains how your personal data will be processed in the research.

1. **Data Controller**

University of Turku

**OR**

Researcher: [Name]

Contact person for research-related matters:

Name: [Contact person's name]

Phone: [Phone number]

Email: [Email]

Responsible researcher:

Name: [Name]

Phone: [Phone number]

Email: [Email]

If the researcher is employed by the University of Turku and the research is part of a research project conducted at the University of Turku, the data controller is usually **the University of Turku**. If the researcher is not employed by the University of Turku and the research is conducted independently, for example, with a research grant and is not part of a University of Turku project, the data controller is usually **the researcher** themselves. In case of a joint project involving multiple organisations and joint data controllership is agreed upon, all joint data controller organisations should be listed.

If the responsible researcher is the same as the contact person, the responsible researcher section can be removed.

1. **Data Protection Officer's Contact Information**

The data protection officer of the University of Turku can be reached by email at dpo@utu.fi and by phone +358294503009.

If the university is the data controller, the university's data protection officer acts as the research data protection officer. If the researcher is the data controller, a data protection officer usually does not need to be appointed and this section should be completely removed. The exception to this is certain large-scale personal data processing cases, where the researcher acting as the data controller must appoint a data protection officer for their research: https://tietosuoja.fi/en/designating-a-data-protection-officer

1. **Description of Research and Personal Data Processing**

[Concise and clear description of the research and its objectives. Explain what personal data is needed to conduct the research and how it will be used.]

Personal data includes all information that can identify a person or that can be combined to identify a person. Personal data includes direct identifiers (e.g., name, picture, voice) as well as indirect identifiers (e.g., mother tongue, information related to life situation, diagnosis) that can be combined to identify a person.

All actions involving personal data are considered processing, for example collecting, storing, using, transferring, disclosing, and deleting personal data.

1. **Persons Involved in Personal Data Processing**

[List the persons who will participate in processing personal data in the research. If all persons cannot be named yet, describe as accurately as possible which actors may be involved in personal data processing (e.g. "a research assistant to be hired later by the University of Turku").]

1. **Duration of Personal Data Processing**

[Indicate the duration of the research and personal data processing, including the retention period for data containing personal information after the research concludes. Describe any plans for future use of the data in subsequent research.]

Note: Personal data may only be retained for as long as necessary for the lawful purpose for which the data is used.

1. **Lawful Basis for Personal Data Processing**

The processing of personal data is based on Article 6(1) of the GDPR:

task carried out in the public interest:

scientific or historical research or statistical purposes

archiving of scientific or cultural heritage materials

☐ consent of the data subject

compliance with a legal obligation to which the data controller is subject

legitimate interests of the data controller or a third party

In scientific research, the lawful basis for personal data processing is usually the **public interest and its subsection scientific research.**

Consent as a lawful basis for personal data processing is different from ethical consent to participate in the research. Using consent as a lawful basis for personal data processing requires, among other things, collecting separate consents in accordance with the GDPR and committing to deleting already collected personal data from the dataset if the participant withdraws their consent.

1. **Personal Data Included in the Research**

[List the personal data groups to be processed in the research. Consider indirect identifiers as well.]

1. **Special Categories of Personal Data (Sensitive Personal Data)**

No personal data of special categories is processed in the research.

**OR**

The following personal data of special categories is processed in the research:

[List the special personal data categories processed; e.g., health information, ethnic background, sexual orientation, political opinions]

The processing of special categories of personal data is based on Article 9(2) of the GDPR:

task carried out in the public interest:

scientific or historical research or statistical purposes

archiving of scientific or cultural heritage materials

consent of the data subject

compliance with a legal obligation to which the data controller is subject

More information on special categories of personal data and their processing can be found on the Data Protection Ombudsman's website: <https://tietosuoja.fi/en/processing-of-special-categories-of-personal-data>

1. **Sources of Personal Data**

[List the sources from which personal data will be collected (from the research subject or from another source). Describe the methods of data collection; e.g., survey, interview, or sampling.]

1. **Personal Data Protection Measures**

Personal data processed in information systems is protected in the following ways:

user ID and password

logging of use

access control

encryption

two-factor authentication

other, specify:

Manual (e.g., paper or other physical form) data is protected in the following ways: [Describe generally how the data is stored, e.g., in a locked room, in a locked cabinet, or in a space accessible only to authorised personnel, etc.]

Processing of Direct Identifiers:

The data is collected without direct identifiers

Direct identifiers are removed during the analysis phase:

[Describe how the data is pseudonymised]

The data is analysed with direct identifiers because:

[The reason for retaining direct identifiers]

More information on **pseudonymisation** and **anonymisation**: https://www.fsd.tuni.fi/en/services/data-management-guidelines/anonymisation-and-identifiers/

**In practice, it is rare for research data to be fully anonymised.**

1. **Transfer and Sharing of Personal Data with Third Parties**

Personal data is not transferred outside the data controller.

**OR**

Personal data is transferred to the following recipients outside the data controller:

[List all external parties to whom personal data is transferred or who have access to personal data (e.g., research organisations acting as partners, external transcription or translation service providers, or an external archive to which pseudonymised data is archived).]

Transferring personal data outside the data controller almost always requires a data processing agreement. Contact: tietosuoja@utu.fi

1. **Transfer of Personal Data Outside the EU or EEA**

Personal data is not transferred outside the European Union or the European Economic Area.

**OR**

Personal data is transferred to the following countries outside the European Union or the European Economic Area:

[List the countries to which personal data is transferred.]

The transfer outside the EU or EEA is carried out as follows:

The transfer is to a country whose level of data protection has been deemed adequate by the European Commission.

The transfer is carried out using the European Commission's approved standard contractual clauses (SCC).

Other basis: [Specify the basis]

Also consider situations where the servers of the research tool you use are located outside the EU/EEA. If there is a need to transfer research data containing personal data outside the EU/EEA, contact: tietosuoja@utu.fi

1. **Processing of Personal Data After the Study Ends**

The research data is deleted

The research data is retained to assess the reliability of the study results:

without direct identifiers  with identifiers

The research data will be retained for compatible scientific research in the future in accordance with the requirements of the GDPR:

without direct identifiers  with identifiers

The research data is retained [Specify location and duration, e.g., X years or until date X.]

The retention of the research data is based on Article 5(1)(b) and (e) of the GDPR. A new privacy notice will be sent to participants for the new use of the research data, unless the data controller can no longer identify the participants from the research data. A notification of the new study cannot be sent to the data subject if providing the information would be impossible or would involve a disproportionate effort or if it would seriously impair the achievement of the research purposes (Article 14(5)(b) of the GDPR).

1. **Rights of the Data Subject and Exceptions to These Rights**

For more information about your rights under the GDPR, contact the person mentioned in section 1.

**Rights of the Data Subject**

According to the Data Protection Regulation, the data subject has the right to:

* Access their data (Article 15)
* Rectify their data (Article 16)
* Erase their data and be forgotten (Article 17)
* Restrict the processing of their data (Article 18)
* Transfer their data from one controller to another (Article 20)
* Object to the processing of their data (Article 21)
* Not be subject to automated decision-making (Article 22)

However, the data subject cannot exercise all rights in all situations, depending on the legal basis for the processing of personal data.

**Exceptions to Data Subject Rights**

Data protection legislation allows for exceptions to data subject rights when personal data is processed for scientific research and exercising the rights would prevent or significantly hinder the achievement of the research purposes. The need to make exceptions to data subject rights is always assessed on a case-by-case basis.

In this privacy notice, it is likely necessary to make exceptions to the following data subject rights:

[If you make exceptions, justify for each right why the exception is necessary and the extent of the exception.]

Right to access data (Article 15)

Right to rectify data (Article 16))

Right to erase data and be forgotten (Article 17)

Right to restrict data processing (Article 18)

Right to object to data processing (Article 21)

If the processing of personal data in research does not require the identification of the data subject and the controller cannot identify the data subject, the rights to access, rectify, erase, restrict processing, notify, and transfer data do not apply unless the data subject provides additional information enabling reliable identification (Article 11).

If special categories of personal data are processed and exceptions are made to the data subject rights under Articles 15, 16, 18, or 21, the Data Protection Impact Assessment (DPIA) must be sent to the Data Protection Ombudsman’s Office (tietosuoja@om.fi) before processing the personal data.

Note that according to Article 11 of the Data Protection Regulation, data subject rights do not apply when it is no longer possible to identify the individual from the data. In such cases, separate exceptions are not needed.

**Right to Complain**

You have the right to lodge a complaint with the Data Protection Ombudsman if you believe that your personal data has been processed in breach of applicable data protection legislation.

Contact Information for the Data Protection Ombudsman:

Data Protection Ombudsman’s Office

Visiting address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: PO Box 800, 00531 Helsinki

Switchboard: +358 29 566 6700

Email: tietosuoja(at)om.fi