



PRIVACY NOTICE

We invite you to participate in the research project Transforming Integration Systems for Future Skills (TRIM). This transdisciplinary project investigates the capability of the Finnish immigration system to integrate foreign-background people (both from abroad and already in Finland) in the Finnish education and labour market in an economically sustainable and just way, and implements steps to improve the system.

You are participating in scientific research. This privacy notice informs you about the processing of your personal data as part of the research. You have a legal right to receive this information in accordance with the European Union and Finnish legislation.

1. Data Controller(s)

The Data Controller is responsible for lawful processing of personal data in this research.

The Data Controller of this research is: University of Jyväskylä (JYU), Seminaarinkatu 15, P.O. Box 35, 40014 University of Jyväskylä. Business ID 0245894-7. Data Protection Officer: tietosuoja@jyu.fi, + 358 40 805 3297.

Responsible researchers

The Principal Investigator of this project is Research Professor Taina Saarinen

Phone: +358 400247970

Email: taina.m.saarinen@jyu.fi

Work address: University of Jyväskylä, Finnish Institute for Educational Research, P.O. Box 35, 40014 University of Jyväskylä

Team members who process personal data in this research

Postdoctoral researcher Katarzyna Kärkkäinen

Postdoctoral researcher Jawaria Khan

Postdoctoral researcher Sonya Sahradyan

Postdoctoral researcher Golaleh Makrooni

Project researcher Laura Minkinen

Doctoral or masters' students involved in the project, in addition to research assistants, may also process data, and with these persons separate individual data processing agreements will be made.

Processor(s) of personal data

A processor of personal data refers to a party that processes personal data on behalf of the data controller and according to the data controller's instructions. A data processing agreement must be signed with the processor of personal data. The processors that may be used are the following:

- · Microsoft
- · CSC, Funet Miitti Zoom video conferencing service
- · Webropol Oy, survey software
- Atlas.ti (desktop application for data analysis)
- Converis (research information)
- DeepL (JYU license)
- NextCloud (storage service of the University of Jyväskylä)
- Researchvideo (secure JYU content management system for media data)

During the implementation of the research, the data controller can also use processors of personal data who cannot be named in advance. Appropriate agreements must always be made with processors. Suitability of the processors for the secure processing of personal data must be assessed before an agreement is made. The data subject will be informed separately about the use of another processor if the change is significant from the data subject's point of view.

To ensure the accuracy of research data, the Data Controller may submit data for processing (primarily without direct identification data) to a so-called research reviewer or verifier for a defined period when necessary. These reviewers or verifiers work under the supervision of research staff, and data processing agreements are signed with them.

2. Other disclosure of personal data during research

Your personal data can be delivered during this research, for a purpose complying with the original purpose, to other scientific researchers when the processing of these data is based on a public interest. In such cases, sufficient technical and organisational protective measures will be taken care of. If you wish, the research manager in charge will give you specific information about the source to whom your personal data has been disclosed.

The research data (including survey responses) can be given, by permission of the principal investigator in charge, to other universities and researchers in Finland for scientific research on the grounds of public interest. When delivering such data, an agreement is made to bind the recipient to comply with responsible conduct of research, i.e. taking care of the anonymity of the interviewees and appropriate keeping and erasure of the data after the agreed usage.

3. Personal data to be processed in TRIM

Your personal data will be processed for the research purpose described in the information letter.

In this research, we will collect the following personal data on you: name, email address, phone number, country of origin, language, education. In addition, special categories of personal data such as religious background or ethnic origin may come up in the discussions and be relevant in the analysis. We will collect audio records, interview notes, photos, videos, artistic and other outputs produced during the process of generation of data.

All data subjects are over the age of 15.

4. The lawful basis for processing personal data in scientific research

The processing of your personal data is necessary for scientific research purposes on the grounds of public interest, in compliance with Section 4, Subsection 3 of the Data Protection Act. Special categories of personal data or information on offences and criminal convictions are processed for the purpose of scientific research in compliance with Section 6, Subsection 7 of the Data Protection Act.

5. Transfer of personal data outside the EU/EEA area

In this research, your personal data will not be transferred outside the EU/EEA area.

6. Protection for personal data

The processing of personal data in this study is based on an appropriate research plan, and the study has a designated person in charge. Only personal data necessary for the purpose of the study will be processed as research material.

The personal data of research subjects is only processed in environments and using tools that the data controller has determined to be sufficiently secure for the processing of personal data. Special categories of personal data are subject to enhanced data security requirements. A separate data management plan has been drawn up for the processing of the data.

Whenever possible, identifying information is removed from the data as a protective measure (pseudonymisation). Identifiability can then be restored using a code or similar information. During the life cycle of the data, the principle of minimising personal data and the requirement of necessity are taken into consideration.

The researchers have completed data protection and information security course

☒ Yes

Agreements with research assistants and/or processors of personal data /Joint Data Controllers

☒ Yes

7. PROCESSING OF PERSONAL DATA AFTER THE RESEARCH HAS ENDED

After the study is finished, the research data will be anonymised, which means that any information enabling personal identification is deleted.

The anonymised research data will be stored in JYU's JYX service or other similar archive such as Tietoarkisto, from where the data is available by a specific request for research and/or teaching purposes.

8. Rights of the data subject

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

You have the right to get to know whether and which personal data of yours are processed. If you wish, you can also request a copy of your personal data to be processed.

Right to rectification (GDPR, Article 16)

If there are any inaccuracies or errors in your personal data to be processed, you are entitled to request that these be rectified or supplemented.

Right to erasure (GDPR, Article 17)

You have the right to demand in some cases that your personal data be erased. However, the right of erasure is not applicable if the erasure would prevent or greatly hinder reaching the goal 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 some cases, like when you challenge the correctness of your personal data.

Profiling and automatised decision-making

In this research, your personal data will not be used for any automatic decision-making. In this research, the purpose of the processing of personal data is not to assess your personal qualities, i.e. profiling, but personal data and qualities are considered from the perspective of broader scientific research.

Implementing the 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 the implementation of data subject rights are submitted to the JYU Registry Office.

Registry Office and Archives, P.O. Box 35 (C), 40014 University of Jyväskylä, tel. 040 805 3472, email: kirjaamo@jyu.fi. Visiting address: Seminaarinkatu 15, Building C (University Main Building, 1st floor), Room C 140.

Reporting an actual or suspected information security breach to JYU

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

You have to lodge a complaint with a supervisory authority especially with a locally relevant one in terms of your permanent place of residence or work if you regard that the processing of personal data violates the EU General Data Protection Regulation (EU) 2016/679. In Finland, the supervisory authority is the Data Protection Ombudsman.

Updated contact information of the Office of Data Protection Ombudsman: <https://tietosuoja.fi/etusivu>