v1/2023

DATA PROTECTION NOTICE FOR
SCIENTIFIC RESEARCH
General Data Protection Regulation of the EU
Articles 12–14

Date: [31.3.2023]

# Information on the processing of personal data in the research project entitled Understanding bystander anti-racist action in the context of Higher Education

The research project entitled "Understanding bystander anti-racist action in the context of Higher Education" involves processing of personal data. The purpose of this data protection notice is to provide information on the personal data to be processed, from where they are obtained and how they are used. Detailed information on the rights of data subjects will be provided at the end of this notice.

Your participation in the research project and provision of personal data are voluntary. If you do not wish to participate in the project or you wish to withdraw from it, you can do so without negative consequences.

#### 1. Data Controller

University of Helsinki

Address: PO Box (Fabianinkatu 33), 00014 University of Helsinki, Finland

**Tuomas Zacheus** 

Osoite: PL 54 (Unioninkatu 37), 00014 Helsingin yliopisto

# 2. Contact person and principal investigator

Contact person in matters concerning the research project:

Name: Viivi Mäkinen

Faculty/department/unit: Faculty of Social Sciences, Social Psychology

Address: PL 54 (Unioninkatu 37), 00014 Helsingin yliopisto

Phone:

Email: viivi.m.makinen@helsinki.fi

Principal investigator: Name: Tuomas Zacheus

Address: PL 54 (Unioninkatu 37), 00014 Helsingin yliopisto

Phone: 0440342195

Email: tuomas.zacheus@helsinki.fi

### 3. Contact details of the data protection officer

You can contact the University of Helsinki data protection officer via email at

### 4. Description of the research project and the purpose of processing personal data

The research project investigates the factors that can prevent or promote higher education students' intervening in situations where someone is treated unpleasantly or unfairly at the educational institution due to their ethnic background or a similar reason (e.g., language, culture, religion, nationality, skin color). In addition, the study examines ethnic minority students' experiences of discrimination and racism during their studies. Participants are asked to provide background information, e.g., age, gender, place of study, own and parents' country of birth. For participating in follow-up studies or the draw for gift cards, participants are asked to indicate their email addresses on a separate form through the RedCAP program. The contact information is never merged with the answers to the questionnaire, and the collected contact information is destroyed after the completion of the study. The collected material is used for research and developing programs to prevent racism in universities. The answers given by individual respondents cannot be identified from the published articles or research reports.

Personal data is processed as part of a scientific publication at the University of Helsinki. The researchers Tuomas Zacheus and Viivi Mäkinen are responsible for the practical management of the data, such as the minimization of the data to be processed, the accuracy and the determination of storage periods and the use of appropriate systems/applications. The University guides and supports the processing of personal data from planning to the publication of the final work and provides the necessary infrastructure and tools to carrt out the research.

#### 5. Personal data included in the research data

Respondents are asked to provide personal data such as their gender and country of birth that can indirectly identify the person. This information is reported in a way that ensures that individual respondents cannot be identified. Contact information is collected separately and used solely for sending invitations to the follow-up study and organizing the ruffle for gift cards. Contact information is securely stored separately from the material collected through the survey and destroyed after the completion of the study.

### 6. Sources of personal data

The information to be recorded is collected using an electronic questionnaire, which the respondents themselves fill out

# 7. Sensitive personal data

The following special categories of personal data (i.e., sensitive data), as defined in Article 9 the GDPR, will be processed in this research:	of
Racial or ethnic origin Political opinions	

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Religious or philosophical beliefs	
Trade union membership	
Genetic data	
Biometric data for the purpose of uniquely identifying a natural person  Health	
Sex life or sexual orientation of a natural person	
Sex life of sexual orientation of a natural person	
The processing of sensitive personal data is based on Article 9(2)(j) of the General Data Protection Regulation (processing is necessary for scientific research purposes), as well as Section 6, Subsection 1, Paragraph 7 of the Finnish Data Protection Act.	;
Personal data concerning criminal convictions or offences will be processed in the resproject.	earch
The processing of data concerning criminal convictions or offences is based on Section 7, Subsection 1, Paragraph 2 of the Finnish Data Protection Act (the processing of personal concerning criminal convictions or offences or related security measures is allowed for scientific research purposes).	data
Lawful basis for processing personal data	
Personal data are processed on the following basis (Article 6(1) of the GDPR):	
☐ Task carried out in the public interest:	
Scientific or historical research purposes or statistical purposes	
Archiving of research material and cultural heritage material	
Consent by the research subject	
Compliance with a legal obligation to which the controller is subject	
Legitimate interests pursued by the controller or by a third party	
Specify the legitimate interest:	
If the processing of personal data is based on the research subject's consent, he or she call withdraw that consent at any time. The withdrawal of consent does not affect the lawful of processing based on consent before its withdrawal.	
Recipients of data	
The data is stored on password-protected drives at the University of Helsinki. Tuomas Zao	heus
Viivi Mäkinen, and a Research Assistant from the University of Helsinki are responsible fo	
collection. The material will also be transferred to the project leader Minna Lyons at Liver	
John Moores/Wolverhampton University. Personal data will not be disclosed outside tho	-
responsible for processing the material.	
Transfer of data to countries outside the European Economic Area	

# 10.

Data may be transferred to the following countries outside the European Economic Area: The United Kingdom

8.

9.

During the research project, data may also be transferred to recipients in other countries. The groups of recipients are mentioned in section 9 above.

The transfer of data is based on the European Commission's adequacy decision or standard contractual clauses (<a href="https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\_en">https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\_en</a>), whereby recipients of personal data agree to comply with the data protection requirements outlined in the clauses.

# 11. Automated decision-making

The research project involves no automated decision-making that has a significant effect on data subjects.

# 12. Protection of personal data

Personal data included in the research dataset will be processed and kept protected so that only those who need the data can access them.

The data processed in data systems will be protected using the following:  Username and password  Registration/log of use  Access control  Encryption  Two-factor identification  Other, please specify:
Physical material (e.g., data in paper form or other tangible form) will be protected using the following: only anonymized material is stored in manual form, for example during the report writing phase. In addition, manual, anonymized material is stored in locked rooms.
Processing direct identifiers:  The controller collects the personal data without direct identifiers.  Direct identifiers will be removed during the analysis stage and kept separate from the analysed research data.  The data will be analysed using direct identifiers, because (give grounds for preserving the direct identifiers):
13.Duration of the processing of personal data in this research project:
The survey material will be anonymized when the research material has been collected (estimate: autumn 2023). Personal data is stored exclusively for participating in further research and for raffles and is destroyed after the study is completed.
14. Processing of personal data when the research project ends
The research data will be deleted

<ul> <li>         ∑ The research data will be kept for the purposes of validating or replicating the results of this research project:         ∑ without identifiers</li></ul>
☐ The research data will be kept for later, compatible scientific research in accordance with the requirements of the GDPR: ☐ without identifiers ☐ identifiers included
The storage of the research data is based on Article 5(1)(b) and (e) of the GDPR. Data subjects will receive a new data protection notice on the new use of the research data, unless the controller can no longer identify the subjects from the data.
In addition, the data subjects will not be informed of the new research if delivering this information to them is impossible or involves a disproportionate effort or renders impossible or seriously impairs the achievement of the research objectives (Article 14(5)(b) of the GDPR).
Where and for how long will the data be stored: The survey material will be stored on the server of the University of Helsinki until the report is written (estimated December 1, 2024, the estimated completion time of the final report). The survey material is offered for storage in the Social Sciences data archive anonymized and without identifying information.
<ul><li>15. Rights of data subjects and derogations from those rights         The contact person in matters related to research subjects' rights is the contactperson stated in section 1 of this notice.     </li><li>Rights of data subjects</li></ul>
Under the General Data Protection Regulation, data subjects have the following rights:
<ul> <li>Right of access to their own data</li> <li>Right to rectification of their data</li> <li>Right to the erasure of their data and to be forgotten</li> <li>Right to the restriction of processing of their data</li> <li>Right to data portability from one controller to another</li> <li>Right to object to the processing of their data</li> <li>Right not to be subject to automated decision-making</li> </ul>
However, data subjects cannot exercise all their rights in all circumstances. The circumstances are affected by, for example, the legal basis for processing personal data.
Further information on the rights of data subjects in various circumstances can be found on the website of the Data Protection Ombudsman: <a href="https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations">https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations</a> .

**Derogations from rights** 

The General Data Protection Regulation and the Finnish Data Protection Act enable derogations from certain rights of data subjects if personal data are processed for the purposes of scientific research and the rights are likely to render impossible or seriously impair the achievement of the research purposes.

The need for derogations from the rights of data subjects will always be assessed on a case-by-case basis.

#### Right to appeal

If you consider that the processing of your personal data has been carried out in breach of data protection laws, you have the right to appeal to the Office of the Data Protection Ombudsman.

#### Contact details:

Office of the Data Protection Ombudsman

Street address: Ratapihantie 9, 6<sup>th</sup> floor, 00520 Helsinki

Postal address: PO Box 800, 00521 Helsinki

Phone (switchboard): 029 56 66700

Fax: 029 56 66735

Email: tietosuoja(at)om.fi