

Data protection statement for scientific research

DATA PROTECTION NOTICE FOR

SCIENTIFIC RESEARCH

General Data Protection Regulation of the EU

Articles 12–14

Date: [08.08.2022]

Information on the processing of personal data in the research project entitled “The Social Dialogue in Defence of Vulnerable Groups in the Post-COVID-19 Labour Markets project (The DEFEN-CE project)”

The research project entitled “The DEFEN-CE Project” 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 is 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

2. Contact person and principal investigator

Principal investigator:

Name: Professor Heikki Hiilamo

Faculty/department/unit: Faculty of Social Sciences, University of Helsinki

Address: Unioninkatu 37, Helsinki

Email: heikki.hiilamo@helsinki.fi

Contact person in matters concerning the research project:

Name: Chaitawat Boonjubun, DEFEN-CE Project Coordinator

Faculty/department/unit: Faculty of Social Sciences, University of Helsinki

Address: Unioninkatu 35, Helsinki

Phone: +358452206638

Email: chaitawat.boonjubun@helsinki.fi

3. Contact details of the data protection officer

You can contact the University of Helsinki data protection officer via email at tietosuoja@helsinki.fi.

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

The Social Dialogue in Defence of Vulnerable Groups in the Post-COVID-19 Labour Markets project (the DEFEN-CE project), funded by the Directorate-General for Employment, the European Commission, aims to analyse the governance of vulnerable groups in (post) COVID-19 labour market and produce research-based knowledge and expertise on the protection of the vulnerable groups in Europe. In particular, the project investigates the experience of various stakeholders in the design and implementation of COVID-19-related policies relevant for work and employment in the EU member states and two candidate countries which are Serbia and Turkey.

In Finland, the research institution responsible for the study is the University of Helsinki/the Faculty of Social Sciences, and the study is carried out in collaboration with the Tampere University, Finland; the University of Stockholm (SOFI), Sweden; the Central European Labour Studies Institute (CELSI), Slovakia; the Lithuanian Centre for Social Sciences, Lithuania; the University of Duisburg-Essen, Germany; the University of Belgrade, Serbia; and the FONDAZIONE ADAPT, Italy.

The fieldwork includes two parts: survey and semi-structured interviews with policymakers, social partners, and civil society actors at the national and EU levels. The purpose of data collection is to gather information about how stakeholders have been involved in social dialogues aiming to protect vulnerable groups in relation to the labour markets in Europe. Only information on their work on the issue is collected from the respondents and they will not represent themselves in the survey and interview as individuals. Personal data will be collected only for the purpose of keeping in touch and for combining the data from the survey and from the interview. After data is collected, the material will be pseudonymized, including, codes are created for the respondents, and an individual respondent cannot be directly identified from the material itself or from the research reporting.

The University of Helsinki acts as a project coordinator. The implementing partners (as above-mentioned) are responsible for collecting the data and storing the data. In each country, national experts will be employed to collect data with stakeholders at the national level. In addition, there will be semi-structured interviews with EU-level policymakers and interest groups by researchers of the University of Helsinki to explore the actions in Europe in protecting vulnerable groups.

In Finland, the project will use the University of Helsinki's facilities and information systems for data collection, analysis, and storage. In other EU countries and Serbia and Turkey where the DEFEN-CE project researchers conduct research, the facilities and information systems of the host universities/ research institutions will be used for data collection, analysis, and storage.

5. Personal data included in the research data

The following personal data is collected in the study:

- Identification data (separate from the material): name, email address and phone number.
- Indirect identification information:
 - Background information about the respondent's work: the respondent's job title/level and length of time working in the organization. This information is collected in order to make sure that the respondents have sufficient experience in the subject under investigation.
 - Background information about the organization: organization name and location. These are collected in order to be sure of the regional distribution of the responses.
- The written answers of the survey form, which are personal data given by identified persons according to the data protection regulations.
- Audio recording of the interview, which is used only for transliteration and the recording is destroyed after transcription.

For further processing, the research material is pseudonymized so that an individual respondent cannot be identified directly based on the material. Personal codes are created for each respondent, which include classification-level information about their work organization and its location. Other identifying information and the voice recording of the interview will be destroyed as soon as the transcription is done. Paper consent forms will be kept in a locked drawer in a locked room with restricted access only by appropriate persons.

6. Sources of personal data

The collected personal data is obtained from the individuals themselves in writing and/or orally, and is only collected with their consent. Information about each participant's consent to participate in the study is collected in writing before the start of data collection.

7. Sensitive personal data

No special categories of personal data (i.e., sensitive data), as defined in Article 9 of the GDPR, will be processed in this research.

8. 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 can withdraw that consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

9. Recipients of data

Pseudonymized research material of each country is processed by the responsible researchers for that country. Especially, the interview data will not be shared with other partners; only the analysis will be shared for the purpose of a comparative of two-country study. Pseudonymized research material of the EU level is processed by the researchers of the University of Helsinki.

In Finland, personal data is temporarily transferred outside the research group. The recipient of the data is the transcription service company, Happy Scribe. A separate agreement on the processing of personal data (DPA) (ver. C1018) has been concluded with the company, which meets the requirements and principles of the GDPR. The contract was drawn up and reviewed by the University of Helsinki's research lawyers. In the agreement, the company undertakes to process the research material it receives confidentially in a way that protects the participants' privacy in accordance with data protection legislation.

According to the agreement, the company may not use subcontractors in the processing of personal data or transfer personal data outside the EU. The data is deleted from the company's server after the end of the assignment as required by the contract. The information collected in the study is treated confidentially and will not be disclosed to third parties outside the contract. The contract is delivered electronically for viewing upon request.

10. Transfer of data to countries outside the European Economic Area

Data will not be transferred to countries outside the European Economic Area.

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:

- Paper material is kept in a locked room, to which only appropriate persons have access.

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:

Personal data is processed in this study only as long as it is necessary and unnecessary data is destroyed immediately after the end of use. The processing of personal data in this study will end after the end of the project in 2023 at the latest.

14. Processing of personal data when the research project ends

☐ The research data will be deleted

☐ The research data will be kept for the purposes of validating or replicating the results of this research project:

☐ without identifiers ☐ identifiers included

☒ 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.

Before the data can be used for other research, the controller will ensure that the new use is compatible with the initial purpose in accordance with the requirements 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 researchers of the project have the right to use the collected material for further research and academic articles when the project ends, and the final report has been submitted in 2023. In accordance with scientific practices, the data will be stored at the country where the research was done. In particular, the survey and interview data generated in the project will be stored on the servers of the researchers in each project country. In Finland, the data will be stored at the University of Helsinki until 2028. The data will then be stored for further licensed research in an archive that meets the criteria for permanent archiving of qualitative research data (e.g., the Finnish Social Science Data

Archive - FSD), depending on how each research participant defines their consent. After the recording is already transcribed, the audio material will be destroyed.

15. Rights of data subjects and derogations from those rights

The contact person in matters related to research subjects' rights is the person stated in section 1 of this notice.

Rights of data subjects

Under the General Data Protection Regulation, data subjects have the following rights:

- Right of access to their data
- Right to rectification of their data
- Right to the erasure of their data and to be forgotten
- Right to the restriction of processing of their data
- Right to data portability
- Right to object to the processing of their data
- Right not to be subject to automated decision-making

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: <https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>.

If data subjects cannot be identified

If the processing of personal data for research purposes does not require the identification of the data subject and if the controller is unable to identify the data subject, the right to access, rectify, erase and restrict the use of personal data, as well as any notification obligations and the right to data portability do not apply unless the data subject provides additional data enabling their identification (Article 11 of the GDPR).

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, 6th floor, 00520 Helsinki

Postal address: PO Box 800, 00521 Helsinki

Phone (switchboard): 029 56 66700

Fax: 029 56 66735

Email: tietosuoja(at)om.fi