

**DATA PROTECTION NOTICE FOR  
SCIENTIFIC RESEARCH  
General Data Protection Regulation of the EU  
Articles 12–14  
Date: 21.12.2021**

## **Information on the processing of personal data in the research project entitled National Security Survey**

The research project entitled National Security Survey 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 16 (Snellmaninkatu 10), 00014 University of Helsinki, Finland

### **2. Contact person and principal investigator**

Contact person in matters concerning the research project:

Name: Ilari Kolttola  
Faculty/department/unit: Institute of Criminology and Legal Policy  
Address: P.O. Box 16 (Snellmaninkatu 10), FI-00014 University of Helsinki  
Phone: +358 2941 20887  
Email: [ilari.kolttola@helsinki.fi](mailto:ilari.kolttola@helsinki.fi)

Principal investigator:

Name: Matti Näsi  
Address: P.O. Box 16 (Snellmaninkatu 10), FI-00014 University of Helsinki  
Phone: +358 2941 20881  
Email: [matti.j.nasi@helsinki.fi](mailto:matti.j.nasi@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](mailto:tietosuoja@helsinki.fi).

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

National Security Survey (Kansallinen turvallisuuskysely) is a nationally representative survey study conducted by the University of Helsinki's Institute of Criminology and Legal Policy. The survey population consists of people aged between 15 to 74 with an address in Finland. The purpose of the survey is to study perceived safety and experiences of crime among the Finnish population.

Institute of Criminology and Legal Policy is legally mandated to carry out research on crime and legal policy and to monitor and analyse the nature of crime and associated trends (Law on Institute of Criminology and Legal Policy, 1139/2007).

## 5. Personal data included in the research data

Background variables from the Population Information System:

- gender
- age group
- postal code of the home address
- home municipality
- region (maakunta)
- native language (Finnish/Swedish/other)

Background variables from the survey:

- gender
- year of birth
- status of the couple relationship
- size of the household
- education
- employment status
- ownership of car/motor cycle/bicycle/boat/leisure cottage
- perceived financial situation of the household
- birth country of the respondent/mother/father/intimate partner (Finland/other)

Property crimes:

- victim of property crimes during the last 12 months
- reporting to the police

Perceptions about violence:

- different kinds of violent acts or threats

Worry about violence and crime:

- been afraid of becoming a victim of violence when walking about in the evening/during work/by a family member
- been afraid of cybercrime
- area close to home that the respondent avoids due to fear of violence
- seen a fight in own neighbourhood
- disturbances in own neighbourhood

Violent victimisation:

- victim of violence, threats or sexual violence in the last 12 months
- place of occurrence
- relationship with the perpetrator
- reporting to the police

Use of computer and internet

- ownership of computer and smart devices

#### Cybercrime

- victim of crime or harassment during the lifetime/ the last 12 months on the internet

## 6. Sources of personal data

Information necessary for mailing and above mentioned background variables are derived from the Population Information System (Digital and Population Data Services Agency). Other variables are gathered from the respondents in the survey.

## 7. Sensitive personal data

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

- Racial or ethnic origin
- Political opinions
- 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

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 research project.

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 data concerning criminal convictions or offences or related security measures is allowed for scientific research purposes).

## 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

Respondent code, name and postal address will be transferred to the provider of the mailing service (Mailhouse Oy). The mailing service provider will not, at any point, get access to the survey data, including answers provided via the paper form or online.

The paper forms will be transferred to digital form by an outside provider (Tutkimustie Oy). The online survey software is provided by an outside vendor (Questback GmbH). The provider responsible for the recording of the paper questionnaires will process the survey data provided via the paper forms, while the online software provider will process the survey data provided via the online form. Neither provider has access to direct identifiers that could be used to identify single persons.

The anonymised version of the data will be archived in the Finnish Social Science Data Archive.

## 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: Locked premises, access control

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 data for the survey will be gathered at the end of year 2021. After this, the data will be used in the research carried by the Institute. The project is, by nature, a continuous research project. Data from different years are combined to allow comparisons over time.

At the discretion of the research director, the data may be archived to the University of Helsinki Archive either permanently or as long as the data is needed for research purposes.

Name and street address information will be deleted after they are no longer needed for mailing.

### **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 data will be permanently archived to the Finnish Social Science Data Archive without direct identifiers.

### **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 2 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, 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