

Aalto University, University of Helsinki and University of Tampere

## Trust-M Privacy Notice

This privacy notice describes how your personal data will be used in the research study as a participating individual. You have also been provided with document called “Participant Information Sheet”, which explains in more detail how the study is carried out.

### **1. What is being studied in this research study and the purpose of processing personal data**

The Trust-M research project aims to create trustworthy digital public services for improved integration of migrants in Finland, hence strengthening Finnish society through increased inclusion, resilience of the labor market, and economic vibrance. This necessitates understanding of how socially and culturally constructed notions of trust, inclusion and equity are incorporated in present-day public sector digital services, especially those which use algorithmic decision-making through artificial intelligence and machine learning.

This research is funded by Academy of Finland, Aalto University, University of Helsinki and University of Tampere.

### **2. What personal data is processed in the research study**

Please note that what personal data is collected from you depends on which part of the research you are participating and how the data is collected. Trust-M research project collects and processes the following personal data::

#### **From all participants, for practicalities of the research:**

- Consent forms or consent to participate to a research in digital form (including name of the participant)
- We may collect contact details, such as email and phone number

#### **When interviews are used for collecting the data:**

- Audio recording of the interview
- Written interview transcripts

#### **When survey is used for collecting the data:**

- All responses provided in the survey

#### **When audiovisual data is gathered from participants during workshops or on-site fieldwork:**

- Photographs, fieldnotes, drawings, audio recordings, video recordings, and speech data for understanding participant context, language or acoustic analysis.

#### **Special categories of personal data (sensitive personal data)**

Our research does not intend to address or explicitly ask about topics related to sensitive personal data. However, because of the topic of the research may delve into migrant

experiences some sensitive personal aspects may be discussed by researchers in participant interviews; in such contexts participants (you) may voluntarily choose what information to disclose in these discussions related to information about their racial or ethnic origin, religion or philosophical beliefs, political opinions or data concerning health. However, you are not obliged to share any sensitive information about yourself and you may always choose to decline to share sensitive information with the researchers.

#### **Personal data is collected from the following sources:**

From the participant: observational field notes, interviews, focus groups, online surveys, photos and audio/video recordings as needed for the research study.

The research methods are described to you more in detail in the "Participant Information Sheet" -document.

### **3. Processing of necessary personal data and removal of the direct identifiers from the data**

The research study only processes personal data that is necessary for the purpose and execution of the study. The research data is processed during analysis phase of the research in a manner, that you are not directly identifiable to the researchers. Your direct identifiers, such as your name has been replaced, for example, with a random identifier. In addition, the following measures are applied in order to minimise the collected personal data

- In case the research participant reveals directly identifiable information during the interview, based on which the identity of the research participant may be deduced, such as place of work and position, such information is deleted in the transcription phase.
- In case the research participant reveals sensitive personal data and processing of such personal data is not necessary for conducting the research and not a point of interest, such data is deleted in the transcription phase.
- Regarding potential photos, face and other direct identifiers are removed or blurred, in case such information is not relevant for the research.
- Rough classification of survey data is used, for example an age range is used instead of the exact age, to make identification more difficult.
- The audio data from interviews is transcribed in written form and other information which could enable identification of the research participant is deleted.

Identity of the individual research participant will not be disclosed in a scientific publication or other research results to be published. In exceptional cases where the purpose is to publish the name or identity of the research participant, explicit written consent will be requested.

### **4. Legal basis for the processing of personal data**

The legal basis is scientific research, a task in the public interest

### **5. Sharing personal data**

Research data containing your personal data is processed by joint controllers of the personal data, Aalto University, University of Helsinki and Tampere University.

### **Independent controllers:**

Research data which consists of your personal data, may be transferred to a third party, such as scientific publication, for peer-review process or for other purpose, which is mandatory for scientific publishing or validation of the research results.

Research data containing personal data is retained for research data to be used for further scientific research in the same scientific discipline or in other disciplines that support this research study. Research data may also be transferred to other universities or research organisations as part of further research projects.

### **Processors:**

Interview data (initially stored as audio files) will be transcribed into textual transcripts using professional services, and the transcripts serve as the primary data in the analysis phase. The contracts with the service providers will strictly adhere to the personal privacy and confidentiality agreements of the respective universities conducting the research.

## **6. International data transfers**

During the execution and analysis phase of research, research data containing personal data will not be transferred to non-EU / EEA countries or international organizations. However, as part of the scientific publishing process, it might be necessary to transfer the data outside EU/EAA for publishers or peer reviewers for verification of research results, as such parties may be located outside EU/EAA area. However, it is exceptional that scientific publication process would require transferring data regarded as personal data.

## **7. Storage and protection of personal data**

**Protection of manual material:** Any material in paper or in other physical form such as consent forms are stored in a locked and monitored space at PI's office in locked cabinet.

### **Information processed in IT systems**

We will use institutional data storage systems that take into account the appropriate security level of the data and the needs born from our multidisciplinary collaboration. Each consortium party will use its IT services and secure cloud storage services to store data during the project. During the project, data will be stored primarily on the institutional secured servers, which are supported by a snapshot feature and regular backups that make file versions automatically recover from unwanted deletions. For temporary purposes, such as taking notes during an interview, the data will be stored on researchers' laptop computers and later transferred to cloud storage. All the laptops utilized in the project are administered by consortium universities' IT support. They include a secure file transfer over the network with a VPN solution.

The IT services provide regular backup copies of the data content of servers under its administration, including personal cloud folders. If necessary, computational training data (10–11) may be stored on the servers of the Finnish IT Center for Science.

Aalto University's internal secure data storage service (Secwork) would be used as strictly

access controlled and monitored storage space for sensitive data. Only authorised researchers in the research consortium would be provided user accounts to access Secwork to facilitate secure sharing of sensitive research data as needed.

### **Archiving the research data:**

We will contemplate the possibility of archiving data (in anonymized form) with recognized long-term value in the national Fairdata PAS service.

Social scientific data (anonymized transcriptions) will be archived in Finnish Social Science Data Archive: <https://www.fsd.tuni.fi/en/>

## **8. Retention and deletion of personal data**

### **Deletion during and after the study**

Forms (informed consent form etc.) in paper format will be destroyed securely after they have been digitized for archival purposes. The digital material will be archived as long as the research data will be stored. Collected video and audio will be retained for 2 years past the end of the project and then deleted.

Research data containing personal data is retained for research data to be used for further scientific research in the same scientific discipline or in other disciplines that support this research study. Research data containing personal data is deleted after upto five (5) years (or earlier) since the last publication where this research data has been used and exploited. The research data will be reviewed on a yearly basis to ensure it does not need to be retained any longer than necessary for research purposes.

## **9. Rights of the research participant**

According to the General Data Protection Regulation (GDPR), a data subject has the right to:

- receive information on the processing of their personal data
- right to access the personal data collected and processed
- right to rectification of inaccurate personal data
- request that the processing of personal data be restricted
- object the processing of personal data
- right to erasure of personal data if the conditions of Article 17(1) of the Data Protection Regulation are met and processing is no longer necessary for archiving purposes in the public interest or for scientific research or statistical purposes in accordance with Article 89(1)

If the research purpose does not require, or no longer requires the identification of the data subject, the controller shall not be obliged to obtain further information so that the data or the data subject may be identified only for purposes to able the data subject to exercise his/her rights. If the controller is unable to link the data to a particular data subject, the data subject does not have the right to access or correct the personal data, object the processing, or delete the personal data. However, if the data subject provides additional information that allows their identification from the research data, the rights will not be restricted.

## 10. Contact details of the controllers

This research will be carried out by Aalto University Foundation Sr., The University of Helsinki and Tampere University Foundation Sr. The Parties shall jointly determine the purposes and means of the processing of personal data in the research study and thus, shall act as joint controllers of personal data. Division of responsibilities of the joint controllers and contact details of the controller responsible for information as follows:

### Person in charge of the research study

Questions regarding the conduct of the research study may be addressed to the person in charge of the study: Tom Bäckström, +358 50 406 6120, [tom.backstrom@aalto.fi](mailto:tom.backstrom@aalto.fi).

Contact details of the other joint controllers of personal data:

1) University of Helsinki, Business ID: 0313471-7, Yliopistonkatu 4, 00100 Helsinki (hereinafter "HY") Contact person: Aaro Tupasela, +358 40 6698202, [aaro.tupasela@helsinki.fi](mailto:aaro.tupasela@helsinki.fi)

2) Tampere University Foundation sr, Business ID 2844561-8, Kalevantie 4, 33100 Tampere (hereinafter "TAU")  
Contact person: Thomas Olsson, +358 408490819, [thomas.olsson@tuni.fi](mailto:thomas.olsson@tuni.fi)

### Data Protection Officer

If the research participant has questions or requests related to data protection or the processing of personal data, the research participant should contact the Data Protection Officer of Aalto University: tel. +358 9 47001 (exchange), [dpo@aalto.fi](mailto:dpo@aalto.fi).

In this data request service, you can request the exercise of your rights under GDPR from Aalto University as the controller <https://datarequest.aalto.fi/en-US/>.

If a participant of the research study feels that his or her personal data has been processed in violation of data protection legislation, the participant has the right to lodge a complaint with the supervisory authority, the Data Protection Ombudsman's office (read more: <http://www.tietosuoja.fi>).