

PRIVACY NOTICE FOR SCIENTIFIC RESEARCH

Date: November 7, 2022

1. Name of the research

High-skilled internationals: bottom-up insights into policy innovation for work and entrepreneurship in Finland (HIWE)

2. Data controller

University of Eastern Finland and University of Turku.

3. Research parties and the division of responsibilities

This research is carried out as a collaboration between the University of Eastern Finland (UEF) and the University of Turku (UTU). UEF Business School leads the project, associate professor Tero Montonen acting as the responsible leader. Professor Ulla Hytti acts as the leader of the Turku School of Economics research group.

4. Research implementers

Principal Investigator: Associate Professor Tero Montonen, University of Eastern Finland Business School. Co-Investigators: Professor Ulla Hytti Turku School of Economics, University of Turku; Dr. Tiina Rättälä, University of Eastern Finland Business School; Dr. Juho Pesonen, University of Eastern Finland Business School; Dr. Piritta Parkkari, University of Eastern Finland Business School; Researcher Tuuli Pulkkinen, University of Eastern Finland Business School; Researcher Anna Elkina, Turku School of Economics, University of Turku; Researcher Satu Aaltonen, Turku School of Economics, University of Turku; Researcher Tellervo Poutiainen, Turku School of Economics, University of Turku; Dr. Tommi Pukkinen, Turku School of Economics, University of Turku.

5. Contact information of the data protection officer

University of Eastern Finland's Data Protection Officer
Helena Eronen
helena.eronen@uef.fi
+358 50 5760282

6. Contact person for matters related to the processing of personal data

Tero Montonen, University of Eastern Finland Business School. Address: Kuopio Campus, Novapolis, Mikrokatu 1 G, P.O. Box 1627, 70211, Kuopio (Finland). Tel. +358403552074. Email: tero.montonen@uef.fi.

7. Nature and duration of the research

One-time research Follow-up research

Duration of the research (how long the personal data is to be processed):

Anticipated date that research will begin: October 1, 2022

Anticipated date that research will end: September 30, 2034

How the personal data will be processed after the research has ended:

- Any research materials containing personal data will be destroyed
- Any research materials containing personal data will be archived
 - without identifiers
 - with identifiers

Where the materials will be archived and for how long:


After the project, the data will be archived in a password-protected external hard drive. This physical device will be safely stored for ten years after the completion of the project after which time it will be deleted.


8. For what purpose will the personal data be processed?

The purpose for the processing of the personal data is scientific research. Specifically, data collection and data analysis in this study will allow us to gain new knowledge of the life and working experiences of international talent in Finland.

9. On what basis will the personal data be processed?

The processing of personal data always requires a legal basis. In this research, the processing basis is:

- a task carried out in the public interest / the exercise of public authority belonging to the controller, more specifically:
 - scientific or historical research or the compilation of statistics
 - the archival of research materials and cultural heritage materials
- the implementation of the legitimate interests of the controller or a third party
 - specify the legitimate interest:
- consent of the data subject 
- compliance with the controller's legal obligations
 - related acts:

The research includes the processing of special categories of personal data or personal data relating to criminal convictions and offences . The special basis required for the processing this type of data is:

- archival for the purposes of the public interest, scientific or historical research, statistical purposes
- explicit consent the data subject
- a reason related to an important public interest on the basis of legislation
- on the grounds of public interest in the area of public health

10. What personal data is included in the research materials?

First and last name

Email address

Phone number

Gender identity

Age

Place/country of birth

Previous countries of residence and work
Current place of residence and work
Education (level and field)
Current field of work, job description
Voice and video image

What sources will be used to collect the personal data?

The following sources will be used to collect the personal data:

- Directly from research participants
 - Interview
 - Video recording
 - Digital questionnaire (Webropol or similar)
 - Questionnaire sent by mail
 - Other method, please specify:
- From other sources than the participants in the research, where and what data: Publicly available data from the participants' social media accounts, especially LinkedIn, when identifying potential interviewees for the research and mapping their educational and work history.
- The research subject is not obligated to provide the necessary personal data, participation is voluntary

11. Transfer/disclosure of the data outside the research group

During the project, the data will not be transferred nor disclosed outside of the UEF and UTU research teams. After the end of the project, the further use and the publication of the data will be decided jointly by the leaders Montonen and Hytti.

12. Data transfer/disclosure outside the EU or the EEA

No personal data will be transferred outside EU or the EEA.

13. Automated individual decision-making (including profiling)

In this scientific research, the processing of personal data is not used in automated individual decision-making or profiling.

14. Protection of personal data

A preliminary ethical review has been conducted on the research:

- Yes
Research ethics committee that provided the supporting statement:
- No

The data that is to be processed in the information systems has been protected using the following:

- user ID password user registration access control (physical location)
- other methods, please specify:

Pseudonymisation and anonymisation:

When conducting scientific research, it is necessary to store the research materials used, so that the results of the research can be verified and that the research materials that have already been collected

can be used in further research and new scientific research initiatives. The research materials will be anonymised or pseudonymised whenever possible. The research results will be published in such a way that no individual persons can be identified from the results. In special cases, such as when an artist is interviewed about their work, there may be reason to identify the person.

In this research:

- The materials will be anonymised during the establishment phase of the materials (all identification data will be removed completely to ensure that the identification data cannot be reintroduced to the materials and that no new data can be linked to the materials)
- Direct identifiers will be removed during the establishment phase of the materials
 - Pseudonymised materials, meaning that a code or similar piece of information can be used to reintroduce the identification data back to the materials and that new data can be linked to the materials
 - The research data will be analysed using only indirect identifiers
- The collected data contains only indirect identifiers
- The materials will be analysed using direct identification data, because (specify justification for retaining direct identification data):

Safeguards to protect any sensitive data:

- Research plan
- Responsible leader of the research, please specify: Tero Montonen
- All personal data will be processed and disclosed only for research purposes and all the participants in the research agree to ensure that no data pertaining to a specific individual will be disclosed to any third parties
- A data protection impact assessment has been conducted on the research.

15. The rights of the data subject and derogations on that

The data subject has following rights:

- Right to obtain information on the processing of personal data, unless an exception has been provided for by law
- Right of access
- Right to rectification
- Right to erasure (right to be forgotten). Not applied when legal basis of processing is legal obligation or public interest
- Right to withdraw the consent regarding processing of personal data
- Right to restriction of processing
- Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to object to the processing when legal basis of processing is public or legitimate interest
- Right to data portability when legal basis of processing is consent
- Right not to be subject to a decision based solely on automated processing
 - The data subject can allow automated decision-making (including profiling) with his or her specific consent
- Right to file a complaint to the Office of Data Protection Ombudsman if he/she considers that the current data protection legislation has been violated during the processing of his/her personal data

To exercise his or her rights, the data subject can contact the controller or the contact person or the data protection officer of the research. Further information related to the rights of data subjects can be

requested from the contact person or from the data protection officer of the research mentioned in the beginning of this Privacy Notice.

If the purposes for which a controller processes personal data do not or do no longer require the identification of a data subject by the controller, the controller shall not be obliged to maintain, acquire or process additional information in order to identify the data subject for the sole purpose of complying with this Regulation. If the controller cannot identify the data subject the rights of access, rectification, erasure, notification obligation and data portability shall not apply except if the data subject provides additional information enabling his or her identification.

A derogation in the rights of data subject is necessary and justified if the research is meant for the purposes of the public interest and the rights of the research participant would be likely to prevent reaching these goals or hinder them greatly and these derogations are necessary to ensure these objectives.

- There are no derogations from the rights of the data subjects in this research.

This research is likely to derogate from the following rights specified in the EU General Data Protection Regulation (justifications and protection measures for the derogation are located below):

- The data subject's right to check any data concerning them.
- The data subject's right to rectify any data concerning them.
- The data subject's right to restrict the processing of personal data.
- The data subject's right to object to the processing of personal data.

The following protection measures have been enacted in this research so that the derogation in the rights of the research participants can be made:

- The processing of personal data is based on the research plan.
- The research has a responsible leader or group.
- The personal data is used and disclosed only for the purposes of historical or scientific research or some other compatible purpose and all parties involved in the research agree to ensure that no data pertaining to any specific individuals is disclosed to any third parties.
- The research involves the processing of sensitive materials and an impact assessment on this has been made and submitted to the Office of the Data Protection Ombudsman 30 days before the processing is set to begin.