



PRIVACY NOTICE FOR SCIENTIFIC RESEARCH

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Notice on the management of personal data for participation in the study related to the project "DIGITAL skills for transformative Innovation Management and Entrepreneurship (Digi-Me)" Project co-funded by the European Union, through the European Health and Digital Executive Agency (HADEA), under grant agreement no. 1011123009, approved by the Ethics Committee for Human Sciences at the University of Vaasa (Dnro: 265/00.10.01/2026).

Dear student,

Participation in the DIGI-ME project involves the processing of your personal data. The purpose of this document is to provide you with specific information on how and for how long your data will be processed and how you can exercise your rights, if any.

The DIGI-ME project aims to create, develop, nurture and sustain a broad community of EU leaders capable of mastering digital tools and processes applied to transformative innovation to address Europe's efficiency priorities in a variety of sectors. DIGI-ME aims to provide high-quality customized training and education within an ecosystem centered on EU policy.

1. Controller of the study

Name: University of Vaasa

Address: Wolffintie 32, 65200 Vaasa, Finland

Ethics Committee for Human Sciences at the University of Vaasa:

tietosuojavastaava@uwasa.fi

2. Parties and their responsibilities in research collaboration

- **Coordinator:** Università degli Studi di Pavia (UNIPV).
- **Partners (Beneficiaries):**
 - Vaasan Yliopisto (UNIVAASA), Finland
 - Grenoble Ecole de Management (EESC GEM), France
 - Consiglio Nazionale delle Ricerche (CNR), Italy
 - Domyń S.p.A., Italy
 - Parco Scientifico Tecnologico Kilometro Rosso SPA (KMR), Italy
 - OBLOO S.R.L. (Obloo), Italy
 - LEAN EXPERIENCE FACTORY SCARL (LEF), Italy

3. Director or team responsible for the study

Adam Smale



4. Contact details of Data Protection Officer

Emilia Lamminmäki

Email address: tietosuojavastaava@uwasa.fi

5. Researchers involved

The following centers are involved in the project:

- **Coordinator:** Università degli Studi di Pavia (UNIPV).
- **Partners (Beneficiaries):**
 - Vaasan Yliopisto (UNIVAASA), Finland
 - Grenoble Ecole de Management (EESC GEM), France
 - Consiglio Nazionale delle Ricerche (CNR), Italy
 - Domyn S.p.A., Italy
 - Parco Scientifico Tecnologico Kilometro Rosso SPA (KMR), Italy
 - OBLOO S.R.L. (Obloo), Italy
 - LEAN EXPERIENCE FACTORY SCARL (LEF), Italy

6. Contact person in matters concerning research data

Adam Smale, University of Vaasa, School of Management

Consiglio Nazionale delle Ricerche (CNR)

Registered office: Piazzale A. Moro 1 - 00100 Roma, Italy;

Operating office: Istituto di Fisiologia Clinica, V. Moruzzi 1 - 56124 Pisa, Italy;

Contact information: cnr-ifc.segreteria@cnr.it, 0503152216

Operating office: Istituto per le Tecnologie Didattiche, V. La Malfa, 153 - 90146 Palermo, Italy;

Contact information: segreteria.palermo@itd.cnr.it, 0916809200

7. Name, nature and duration of the study

- Name of the study: DIGital skills for transformative Innovation Management and Entrepreneurship (DIGI-ME).

☒ One-time research

☐ Follow-Up Study (or Longitudinal Study)

- Duration of the study (how long personal data will be processed):

The data collected will be kept for the time necessary to carry out the project (4 years) and for 3 years after the end of the project to allow the publication and presentation of its results in scientific journals and events. Therefore, data will be collected for 7 years from the start of the project. After this period, the data will be completely anonymized and the physiological signals will be deleted.



8. Purpose of the processing of personal data

The project aims to improve teaching methods and learning approaches. The data collected will be used to develop and propose an educational program based on the concept of personalized learning.

Through a preliminary assessment of your digital skills and a psychological evaluation (via questionnaires) and physiological evaluation (via wearable sensors), your unique learning model—tailored specifically to you—and your personalized study plan will be defined.

All data collected will be processed for scientific research purposes and based on your explicit consent (Articles 6(a), 9(a), and 9(j) of EU Regulation 2016/679).

The personal data collected is processed for the following purposes:

1. for participation in the study and, therefore, for scientific and statistical research purposes aimed at protecting the health of the community in the medical, biomedical, and epidemiological fields. The legal basis for the processing is your explicit and specific consent (Articles 6, paragraph 1, letter a) and 9, paragraph 2, letter a), GDPR). You have the right to withdraw your consent at any time, without prejudice to any processing carried out prior to the withdrawal;
2. fulfillment of specific legally relevant obligations or performance of specific tasks provided for by applicable laws or regulations (e.g., in the context of a safety communication or an inspection by the competent national authority). The legal basis is the fulfillment of a legal obligation to which the Data Controller is subject (Articles 6, paragraph 1, letter c) and 9, paragraph 2, letter i, GDPR);
3. for educational purposes (e.g., consultation for the preparation of a degree thesis or participation in conferences, seminars, etc.), always subject to the adoption of appropriate data anonymization techniques to make it difficult to re-identify the data subject. The legal basis for processing is your explicit and specific consent (Articles 6, paragraph 1, letter a) and 9, paragraph 2, letter a, GDPR), which may be revoked at any time;
4. publication of raw data on a sharing platform for purposes of general interest in the field of scientific research, with the possibility of reuse in other studies in the same field. Prior to sharing, the data will be anonymized. Access to the information entered in the repository will be limited to identified and authorized individuals based on the reasons given in the access request and where attempts to re-identify the anonymized data are expressly prohibited. In cases where it is not possible to ensure sufficient data anonymization, without prejudice to the rules governing access to information, the data will be published in a de-identified form, thus preventing the data from being immediately traced back to the data subject, and will be subject to your prior explicit consent. In the latter case, the legal basis for the processing is your explicit and specific consent (Articles 6, paragraph 1, letter a, and 9, paragraph 2, letter a, GDPR), which can be revoked at any time.

Your consent is not mandatory, but it is necessary for the processing of your data, without which it is impossible to participate in the project.



9. Lawful basis of processing

The processing of personal data is based on Article 6 or Article 9 of the EU General Data Protection Regulation.

EU General Data Protection Regulation, Article 6 (1) (choose one basis for each purpose of processing):

- ☐ Consent of the data subject
- ☐ Compliance with a legal obligation to which the controller is subject legal acts:
- ☐ Performance of a task carried out in the public interest or the exercise of public authority
 - ☒ Scientific or historical research or the compilation of statistics
 - ☐ Archiving of research materials and cultural heritage materials

EU General Data Protection Regulation, Article 9 (special categories of personal data):

- ☐ Consent of the data subject
- ☒ Archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

10. Categories of personal data included in the research data

To carry out the DIGI-ME project, it is necessary to collect and process your personal data. These data will be collected:

- personal data (name, surname, gender, age);
- data related to your physical and health condition (possible pathologies, electroencephalogram, ECG, skin conductance);
- answer on forms about your motivations related to the course of study;
- data relating to your interaction with a virtual reality environment.

11. Sources of personal data

University of Vaasa database - Peppi

The sources from which the data will be collected are:

- **The research subjects (students) themselves:** Through various pre-assessments and self-report instruments.
 - **Digital skills evaluation.**
 - **Psychological assessment** (using distributed questionnaires) to investigate psychophysical factors such as motivation, stress, anxiety, depression symptoms, and self-efficacy.
 - **Soft skills and career ambitions** pre-assessments.
- **Wearable devices:** These are used to measure and collect physiological signals directly from the students. The devices include:
 - An **electrocardiograph**.
 - A device to measure **galvanic skin response** (GSR).



- An **EEG (Electroencephalograph)**.

12. Transfer or disclosure of personal data to third parties

Your data will be disclosed only to the project partners, who are joint controllers, as listed in the specific section (Section 6).

Only aggregated and anonymized data will be made available to the scientific community following the conclusion of the project.

The anonymized data collected for research purposes could be published in a publicly accessible "repository"—that is, a database designed to collect and store data in digital format—in order to promote the dissemination of research findings with a view to advancing research itself and the scientific community (e.g., Zenodo).

Personal data will not be disclosed. However, scientific data resulting from the analysis of the Study's data may be disclosed—but only in a strictly anonymous form, meaning in a way that no longer allows the data to be linked to the data subject—through scientific or statistical publications.

The transfer and disclosure of personal data are described in the context of the DIGI-ME project protocol and involve the collaborating centers:

Joint Data Controllers and Sharing

- Each participating center, with the exception of Domyn S.p.A., is a **joint controller** of personal data.
- No personal data will be shared between the Partners unless it has been **pseudonymized**.
- The personal data collected will be the **minimum necessary** to achieve the research objectives, will be treated confidentially, and will be for the sole purpose of implementing the project.

Involved Centers/Third Parties

The project involves the collaboration of several institutions, which will handle different aspects of the data:

- **Student Enrollment and Surveys:** Università degli Studi di Pavia-Dipartimento di Scienze Economiche e Aziendali, Vaasan Yliopisto-School of Management, and Etablissement d'Enseignement Supérieur Consulaire Grenoble Ecole de Management.
- **Moodle E-learning Platform Creation:** Domyn S.p.A..
- **AI Algorithm Implementation:** CNR (Consiglio Nazionale delle Ricerche).

Data Protection Measures

The management of data, including its transfer, will comply with regulations (EU Regulation 2016/679 - GDPR and national regulations) and will include:

- Reference to **ISO 27799:2016** for the management of health information security.
- Measures such as **access control, separation of demographic/identifying data, use of de-identified data, and encryption techniques** for confidentiality in storage and communication.



13. Transfer or disclosure of personal data to countries outside the EU or European Economic Area

Your data will not be transferred to extra EU countries.

The research protocol on **Data Protection and Privacy** focuses on the following:

- **Internal Compliance:** All researchers undertake to comply with the European General Data Protection Regulation (GDPR).
- **Data Sharing:** No personal data will be shared between the project Partners (UNIPV, GEM, UNIVAASA, CNR, and Domyn S.p.A.) unless it has been **pseudonymized**.
- **Partnership Locations:** The listed joint data controllers and processor are all located within the EU/EEA (Italy, France, Finland).
- **Data Measures:** Confidentiality and security are ensured through technical and organizational measures like pseudonymization, access control, de-identified data, and encryption.

14. Automated decision-making

- **Process Description (Profiling/Automated Processing):** The project uses **Artificial Intelligence (AI) algorithms** to analyze complex data (from questionnaires and wearable sensors) to design a tailor-made learning model for each student. This analysis for the purpose of customizing the training constitutes a form of profiling.
- **Human in the Loop / Mentoring:** The study's personalized pathway is supported by a system that includes human intervention. The tailor-made courses combine immersion, interactivity, and **hybrid mentoring (human & AI)**.
Given this, the standard statement that "no automated decisions are made" would be inaccurate. The process relies on automated analysis, but with a human component ("hybrid mentoring") involved in the overall personalized training program.

15. Safeguards to protect personal data

☒ The data is confidential

Protection of manual material:

Personal data processed in IT systems:

☒ Username ☒ Password ☒ Logging ☒ Access control

☐ Other, please specify:

Processing of direct identifiers:

☒ Direct identifiers will be removed in the analysis phase

☐ The material to be analysed includes direct identifiers. Reason: (reason for the retention of direct identifiers)



16. Processing of personal data after the completion of the study

- ☐ The research material will be deleted
☒ The research material will be archived ☒ without identifiers ☐ with identifiers

How long will the material be archived: 3 years

17. Rights of the data subject and possible restrictions

Data subjects have the right to withdraw their consent provided that the processing of the personal data is based on consent.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman's Office if they think their personal data has been processed in violation of applicable data protection laws.

Derogation from the rights of the data subject under the EU General Data Protection Regulation in scientific research is possible subject to the following safeguards:

1. The processing of personal data is based on a research plan.
2. A person or team responsible for the study has been appointed.
3. The personal data will only be used and disclosed for purposes of historical or scientific research or other compatible purposes. Data relating to any specific individual will not be disclosed to third parties.
4. If the study includes processing of personal data referred to in Article 9(1) (special categories of personal data) and Article 10 (personal data related to criminal convictions and offences) of the Data Protection Regulation, in addition to complying with sections 1–3 above, a data protection impact assessment under Article 35 of the Data Protection Regulation must be made and submitted to the Data Protection Ombudsman's Office 30 days before the start of the study.

This study will derogate from the following rights of the data subject under the EU General Data Protection Regulation:

- ☐ Right of access (Article 15)
- ☐ Right to rectification (Article 16).
- ☒ Right to erasure (Article 17). The right to erasure shall not apply to scientific or historical research where it is likely to prevent or impede the processing.
- ☐ Right to restriction of processing (Article 18).
- ☐ Right to object (Article 21).

The contact person for matters concerning the rights of data subjects is the Data Protection Officer, whose contact information is provided in section 4 of this notice.