



## PRIVACY NOTICE

EU General Data Protection Regulation (2016/679),

Articles 13 and 14

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### 1. Controller of the study

Vaasan yliopisto  
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### 2. Representative of the Data Controller and Contact Persons

Representative:  
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Contact person:  
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### 3. Contact details of the Data Protection Officer

Sami Kinnunen  
tietosuojavastaava@uwasa.fi

### 4. Name of the Research Register

VME Interaction Design Environment – Research participants

### 5. Purpose of the processing of personal data

In the research environment, personal data may be collected related to research and education.

### 6. 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) based on point i) or ii)

- i) Consent of the data subject



- ii) Performance of a task carried out in the public interest for
  - a. Scientific or historical research or statistics
  - b. Archiving of research materials and cultural heritage materials

EU General Data Protection Regulation, Article 9 (special categories of personal data) either based on point i) or ii) when permitted under the data protection regulation and an impact assessment has been conducted for the research.

- i) Consent of the data subject
- ii) Archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

## **7. Personal data included in the research data**

The material processed in the research environment may include the following personal data:

- Name
- Email
- Phone number
- Video recordings of participants and the environment
- Audio recordings
- Demographic information (such as gender and age)

## **8. Sources of personal data**

The personal data processed in the research environment is obtained directly from the individuals themselves.

## **9. Transfer or disclosure of personal data to third parties**

Personal data may be shared with third parties if access to personal data or other processing is necessary for i) compliance with applicable law and/or regulation, or ii) detection, prevention, or handling of misconduct, security risks, or technical issues. The research environment informs individuals about such use of personal data whenever possible.

## **10. Transfer or disclosure of personal data to countries outside the EU or European Economic Area**

Personal data is not transferred outside the EU or EEA areas.

## **11. Automated decisions**

No automated decisions are made.



## 12. Safeguards to protect the personal data

The research environment employs appropriate technical and organizational measures to protect personal data from unauthorized or unlawful processing, as well as from accidental loss or destruction.

For the material containing personal data within the research environment, the following principles are followed:

Manual material:

- Personal data is protected from unauthorized access and unlawful processing (e.g., destruction, alteration, or disclosure).
- Any documents are kept securely locked in a restricted area.

Data processed in information systems:

- Information systems and services are protected according to industry best practices against unauthorized access, their operational capability is ensured to the necessary extent, and their life cycle is managed.

In addition, operators using the space must ensure the proper protection of personal data when used outside the research environment.

## 13. Processing of personal data after the completion of the study

The data contents are retained within the research environment only for the duration required by the associated activity (e.g., research). The entity responsible for the activity (such as the research conductor) is accountable for ensuring that materials containing personal data stored in the research environment are appropriately destroyed when they are no longer required for activities conducted within the research environment.

## 14. Rights of the data subject and their 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.