

Privacy Notice – Scientific Research

This privacy notice describes how we process your personal data in compliance with data protection legislation. In data protection legislation, the term “data subject” refers to the person whose personal data are processed. In this privacy notice, we refer to data subject as “you” and controller as “we”.

This privacy notice may be updated or edited if necessary. You will be notified of any significant changes as mandated by data protection legislation.

This privacy notice came into force on 01.09.2026

1. Controller

The controller of the research project is:

Tampere University Foundation sr. (Tampere University)

Business ID: 2844561-8

Kalevantie 4 FI-33100 Tampere, Finland

The research project will be conducted by salaried employees of Tampere University Foundation (Tampere University).

The contact person for questions about data processing is Tiina Schafeitel-Tähtinen, who can be reached at tiina.schafeitel-tahtinen@tuni.fi. To call Tampere University's switchboard, dial +358 (0) 294 52 11.

If you have general questions about data protection at Tampere University, please email our Data Protection Officer at dpo@tuni.fi.

2. Scope and purpose of data processing

Name of the research project: Autonomy and motivation of learners– comparison of two learning platforms

This is a one-time study research project that will last until 31.12.2028.

We will process your personal data as part of a research project. The purpose of processing your personal data is to conduct the research project specified above.

The research project explores and compares learner autonomy and motivation in the context of two different cybersecurity learning platforms, Harpo and Plussa. Year 2026-2027 participants use Harpo and year 2027-2028 participants use Plussa as a learning platform. These platforms encourage learner autonomy differently, and this research maps learner experience. Besides variables of autonomy and motivation, the research compares self-efficacy and learning, both objective and perceived. The goal of this study is to gain insight how different kinds of platforms supports learning and motivation, and to collect information to develop and improve learning platforms.

Participation in this research is voluntary. As background information, we will collect your age group, gender, and information about your previous and current studies. In the survey, we also collect data regarding experienced course difficulty, motivation, self-efficacy, and learner autonomy. From Harpo we collect your learning self-evaluation, and from Sisu we collect your Cyber security 1 course grade. You can stop answering at any time, and you can also request the deletion of data you have already provided.

Your survey responses, Harpo learning self-evaluation, and course grade are connected with your student number. During Harpo and course grade collection, your name is available to the researcher. For the purposes of the study, your name will not be collected or used as part of the study, and your combined survey, Harpo self-evaluation and course grade data will be pseudonymised after the data collection. The results will be reported in such way that individual participants cannot be identified from the results.

The principal investigator (lead researcher) is responsible for overseeing the research project. The research group may also be assigned to serve as the principal investigator, with its members participating in conducting the research project.

The research findings, reported in aggregate form so that individual research participants cannot be identified, are intended to be published in relevant scientific journals.

3. Lawful basis for processing personal data

The lawful basis for processing your personal data is:

- ☐ consent (of the data subject)
- ☐ controller's legal obligation
- ☐ protection of vital interests
- ☒ a task carried out in the public interest or the exercise of official authority
 - ☒ scientific or historical research or compilation of statistics
 - ☐ archiving of research and cultural heritage material

☐ legitimate interests of the controller or a third party

4. Sources and types of personal data

Depending on the circumstances, we may collect personal data either directly from you or from other sources. We will collect data from:

- ☒ you as the data subject
- ☒ the following regular data sources: Sisu

We will process the following types of personal data:

☒ General personal data:

From survey:

- Age group
- Gender
- Study program
- Year of study
- Degree currently pursued
- Whether the student is a degree student, an exchange student, or a FiTech student
- Time when the student started working on course
- Measurements of experienced course difficulty, self-efficacy (general and cyber), motivation, and learner autonomy
- Student number. This is used for connecting data from survey, Harpo and Sisu and pseudonymised after collection.

From Harpo:

- Participating students' learning self-evaluations, timestamps of starting and ending the course
- Student number. This is used for connecting data from survey, Harpo and Sisu and pseudonymised after collection.
- Name. During data collection, your name is available to the researcher. This is not used or collected for the study.

From Sisu:

- Participating students' COMP.SEC.100 course grades, and their timestamp.
- Student number. This is used for connecting data from survey, Harpo and Sisu and pseudonymised after collection.
- Name. During data collection, your name is available to the researcher. This is not used or collected for the study.

We will process data on the following categories of data subjects:

☐ employees ☒ students ☒ research participants ☐ research staff ☐ others, please specify:

5. Transfer and disclosure of personal data

Under certain circumstances, your personal data may be transferred to a third country or an international organisation located outside the European Union (EU) or the European Economic Area (EEA). During such transfers, personal data will be appropriately protected by employing suitable transfer mechanisms (such as standard contractual clauses) and technical measures.

☒ Your personal data will not be transferred outside the EU/EEA.

☐ Your personal data will be transferred outside the EU/EEA as follows:

☒ Your personal data will not be regularly disclosed to other controllers.

☐ Your personal data may be disclosed to other controllers under data protection legislation as follows:

6. Protecting personal data

Your personal data will be protected using appropriate technical and organisational measures. We will protect your data through technical measures, including antivirus software, firewalls and regular software updates. Users who can access personal data are required to log in with a username and password or, in some cases, with multi-factor authentication.

We will also protect your data through organisational measures. Our staff are obligated to maintain confidentiality, and access to data is restricted. If necessary, we will implement additional safeguards to protect data, such as separate storage locations.

Any physical documents will be safeguarded by storing them in locked facilities.

Material will be:

☐ collected with direct identifiers

☐ collected without direct identifiers

☒ pseudonymised after collection

☐ stored with personally identifiable information, which is necessary for the following reasons:

During this research project, your data will also be protected through the following measures:

7. Retention period for personal data

We will retain your personal data for only as long as necessary, as determined on a case-by-case basis. The retention period also depends on the requirements set out in data protection legislation. We will adhere to our Data Management Plan and all applicable legislation when determining the retention period of personal data.

Your personal data will be retained as follows: Data is stored until one year has passed since the last planned publication. Data is deleted when this period ends.

After the research project has been completed, the research records containing personal data will be:

- ☒ destroyed in their entirety
- ☐ anonymised and archived without personally identifiable information.
- ☐ archived with personally identifiable information.

8. Profiling and automated decision-making

We will not use your personal data for profiling or automated decision-making.

9. Data subjects' rights and how to exercise them

Data protection legislation affords certain rights to data subjects, depending on the lawful basis for processing their personal data. Under certain circumstances, your rights may be restricted, for example, due to our legal obligations or if personal data are processed for scientific research, statistical or archiving purposes. If your rights have been restricted, we will implement appropriate and necessary technical and organisational measures to protect your privacy. As a data subject, you have the following rights which you can exercise by sending us a request.

Right of access

You have the right to request confirmation of whether we hold your personal data and to receive a copy of the data we hold.

Right to rectification

You have the right to request that any incorrect or incomplete personal data we hold about be revised or supplemented. You can also request to have any unnecessary personal data erased from our records.

Right to erasure

You have the right to request the erasure of your personal data from our records (“right to be forgotten”) under certain circumstances.

Right to restrict processing

You may have the right to restrict the processing of your personal data in certain cases defined by law. For example, this right may apply if you believe the personal data we hold about you is incorrect or that your data are being processed in violation of data protection legislation, or if you have opposed the processing of your data.

Right to object

In certain circumstances, you have the right to object to the processing of personal data on grounds relating to your particular situation.

Right to data portability

Under certain circumstances, you have the right to request that the personal data you have provided be transferred to another system.

Right not to be subject to automated decision-making

You have the right not to be subject to decisions based solely on automated processing (such as profiling) that produce legal effects concerning you or otherwise similarly and significantly affect you. However, there are exceptions to this prohibition.

Withdrawing consent

If your personal data is being processed based on your consent, you have the right to withdraw your consent at any time.

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority (Data Protection Ombudsman), if you believe that the processing of your personal data violates data protection legislation.

Office of the Data Protection Ombudsman

Street address: Lintulahdenkuja 4, FI-00530 Helsinki, Finland

Postal address: PO Box 800, FI-00531 Helsinki, Finland

Switchboard: +358 29 56 66700

Fax: +358 29 56 66735

Email address: tietosuoja@om.fi