# **Privacy notice** (21.10.2024) for scientific research

EU General Data Protection Regulation (EU 2016/679), art. 12, 13, 14

# 1. Title, nature and duration of research

Title of research:

☐ Case study

Duration of research: 2022-2026

Duration of data processing: Until publications in publication plan have been published and one

year after the last publication.

#### 2. Data Controller

 $\boxtimes$  Research will be conducted in an employment contract with the Tampere University, indicating the University to be the data controller.

Tampere University Foundation sr 33014 Tampere University Kalevantie 4, 33100 Tampere Business ID: 2844561-8

Data Protection Officer of Tampere University dpo@tuni.fi

### 3. Principal investigator or research group

The Principal Investigator is a person assigned by the Data Controller to oversee the implementation of the research project. A research group may also be assigned to serve as the Principal Investigator.

Name: Tiina Schafeitel-Tähtinen

Contact detail: tiina.schafeitel-tahtinen@tuni.fi

# 4. Researchers

Please indicate the persons who will carry out the research activities. If the project is collaboratively conducted, please list the researchers from each partner organisation.

Tiina Schafeitel-Tähtinen

#### 5. Content of research records

Gender

Phase of studies (bachelor, master, doctoral)
Additional information about studies (e.g. exchange, TAMK/university)
Study field
Previously completed education

Survey questions collect CTF feedback data, learning experience data, general and cybersecurity self-efficacy data, CTF content related knowledge and interest data, cybersecurity attitude data, security behaviour intention data, recalled security actions data, cybersecurity studying, career, and research interest data, and cybersecurity beliefs data

## 6. Sources of personal data

Participants (survey)

## 7. Purpose of processing personal data

The purpose of processing personal data is scientific research.

Participants fill pre and post course surveys. Pre and post responses are compared, and effectiveness of the course is measured. Personal information is used as background variables in statistical analysis.

## 8. Lawful basis for processing personal data

The lawful basis for processing is the EU General Data Protection Regulation Article 6 Paragraph 1 and the Data Protection Act (1050/2018) 4 §:

| <ul> <li>☑ Public interest or the exercise of official authority</li> <li>☑ Scientific or historical research purposes or statistical purposes</li> <li>☐ Archiving of materials relating to research or cultural</li> </ul>  |
|---|
| □ Consent   |
| ☐ Legal obligation of the data controlled   |
| ☐ Legitimate interests of the Data Controller or a third party Please specify the legitimate interests:   |
| □ Other, please specify:  |
| 9. Sensitive personal data (special categories of data and criminal records)  □ No sensitive personal data will be processed during the research project □ The following types of sensitive personal data will be processed during the research project: □ Racial or ethnic origin □ Political opinions □ Religious or political beliefs □ Trade union membership □ Genetic data □ Biometric data to uniquely identify a person □ Health data □ Data concerning a natural person's sex life or sexual orientation |
| Data concoming a natural persons son inc or sonation  |

| Will personal data concerning criminal convictions and offences be processed during the research project?  ☑ No ☐ Yes  |
|--|
| 10. Transfer or disclosure of data outside the EU/EEA  Will data stored in the research records be transferred to a country or an international organisation that is located outside the EU/EEA?  ☑ No ☐ Yes, please specify (contact always Data Protection Officer): Description of the measures taken to protect data:                |
| <ul> <li>11. Data protection principles</li> <li>Protection of manual materials (e.g. paper documents):</li> <li>☑ In a locked room</li> <li>☑ In a locked cupboard</li> </ul>   |
| Protection of digital materials (e.g. information systems and equipment):  ☑ usernames ☑ password ☑ multi-factor authentication (MFA) ☑ access management (IP address)   |
| Processing of data that directly identifies an individual:  ☐ Directly identifiable data will be removed during the analysis stage  ☐ The materials will be pseudonymised  ☐ The materials will be analysed without removing directly identifiable data, because (please provide the reasons for retaining personally identifiable data) |
| Protecting data in transit:  □ secure transmission, please specify  ⊠ file encryption, please specify: files will be protected by password  □ other, please specify: Kirjoita tekstiä napsauttamalla tai napauttamalla tätä.   |
| <ul> <li>12. Processing of personal data after the research project has been concluded</li> <li>☐ The research records will be destroyed</li> <li>☑ The research records will be anonymised and archived without personally identifiable data</li> <li>☐ The research records will be archived without anonymisation</li> </ul>          |
| Where will the research materials be stored and for how long: The research material is processed according to Fair Data principles. After the research, survey data is opened and stored   |

in the IDA - Research Data Storage Service. All collected survey data from several CTFs during 2022-2026 is combined without information which year the data is from. Background information with less than 5 students is aggregated under "other" category to mitigate the risk of identifying

students with rare combination of background variables. Opening data gives other researchers access to data, and they can, for example, repeat the analysis of data. In addition, opening the research data enables the reuse of the collected material as part of another research.

# 13. Data subjects' rights and possible restriction thereof

Data subjects have the following rights under the EU's General Data Protection Regulation (GDPR):

# - Right of access

 Data subjects are entitled to find out what information the University holds about them or to receive confirmation that their personal data is not processed by the University.

### Right to rectification

 Data subjects have the right to have any incorrect, inaccurate or incomplete personal details held by the University revised or supplemented without undue delay. In addition, data subjects are entitled to have any unnecessary personal data deleted from the University's systems.

### Right to erasure

o In exceptional circumstances, data subjects have the right to have their personal data erased from the Data Controller's records ('right to be forgotten').

# Right to restrict processing:

 In certain circumstances, data subjects have the right to request the University to restrict processing their personal data until the accuracy of their data, or the basis for processing their data, has been appropriately reviewed and potentially revised or supplemented.

### - Right to object

 In certain circumstances, data subjects may at any time object to the processing of their personal data for compelling personal reasons.

# - Right to data portability

 Data subjects have the right to obtain a copy of the personal data that they have submitted to the University in a commonly used, machine-readable format and transfer the data to another Data Controller.

#### Right to lodge a complaint with a supervisory authority

Data subjects have the right to lodge a complaint with a supervisory authority in their permanent place of residence or place of work, if they consider the processing of their personal data to violate the provisions of the GDPR (EU 2016/679). In addition, data subjects may follow other administrative procedures to appeal against a decision made by a supervisory authority or seek a judicial remedy.

# Contact information:

### Office of the Data Protection Ombudsman

Street address: Lintulahdenkuja 4, 00530 Helsinki, Finland Postal address: PO Box 800, FI-00531 Helsinki, Finland

Switchboard: tel. +358 29 56 66700

Fax: +358 29 56 66735

Email address: tietosuoja@om.fi

| Tł<br>qu | ne Data Contro<br>Jests. | oller follows a | GDPR-compl | liant procedur | e for respondii | ng to subject | access re- |
|----------|--------------------------|-----------------|------------|----------------|-----------------|---------------|------------|
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |
|          |                          |                 |            |                |                 |               |            |