

# Privacy notice for scientific research (15.12.2021)

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

## 1. Title, nature, and duration of research

Title of research: Disabled persons' digital and technological inclusion in the Finnish society: Subjective experiences

Nature of research: This is a case study, which first collects questionnaire data in Finland and then comparative data from Sweden and the United States.

Duration of research: 01 / 2021 - 12 / 2022

Duration of personal data processing: 12 / 2021 - 12 / 2023

## 2. Data controller and contact person, responsible research leader and the person conducting the research

Postdoctoral researcher, Ph.D., Tuuli Keskinen

Faculty of Information Technology and Communication Sciences, Tampere University, Finland

tuuli.keskinen@tuni.fi

## 3. Content of research records

No directly identifying personal data, in other words direct identifiers, will be collected in the study. In the research questionnaire, the following indirect identifiers, among others, will be inquired about as background information from the respondents: Age, gender, mother tongue, education, working life status, the type of disability (hearing impairment / physical disability / visual impairment), and the effect of the disability on daily life. However, answering all background information questions is not required.

## 4. Sources of personal data

The research material is collected in its entirety from the respondents themselves with a questionnaire (which is filled in online or printed and returned by mail).

## 5. Purpose of processing personal data

The purpose of processing personal data is scientific research.

The study surveys the digital inclusion in the Finnish society among adults living in Finland and having a hearing impairment, physical disability, or visual impairment. The research also investigates practical challenges and possibilities related to digital accessibility. Indirect identifiers collected as background information, such as age, type of disability, level of education, and employment status, are used to determine, for example, whether and how different background factors affect the level of perceived inclusion or the nature of problems encountered in digital services.

## 6. Lawful basis for processing personal data

The lawful basis for processing under the EU's General Data Protection Regulation, Article 6 Paragraph 1, and the Personal Data Act, Section 4:

Public interest or the exercise of official authority: Scientific or historical research purposes or statistical purposes

## 7. Sensitive personal data

The following types of sensitive personal data will be processed in the research:

### Health data

Health data or data comparable to health data that are collected are the type of disability (hearing impairment / physical disability / visual impairment), and the effect of the disability on daily life (not at all - very much), other possible disabilities, whether the respondent has the right to use the interpreter service for the disabled, and information on the forms of assistance and assistive products they use because of their disability. From these, only the type of disability and the effect on daily life are mandatory questions.

No information about criminal convictions or offences will be processed in the research.

### Lawful basis for processing of sensitive personal data

The lawful basis for processing under the EU's General Data Protection Regulation, Articles 9 (special categories of personal data) and 10 (personal data relating to criminal convictions and offences), and the Personal Data Act, Sections 6 and 7:

Scientific or historical research in the public interest, statistics, or the exercise of official authority

## 8. Transfer or disclosure of personal data to external parties

Personal data will not be transferred from the person conducting the research to anyone else during the research. The anonymized material may be handed over to the Finnish Social Science Data Archive after the research has ended. When anonymized, the material no longer contains personal data and therefore does not form a personal register.

## 9. Transfer or disclosure of personal data outside the EU / EEA region

The data in the research register will not be transferred to a third country or to an international organization outside the EU or the EEA region.

## 10. Automated decision-making

Decisions will not be made by automated means.

## 11. Data protection principles

### Protection of manual materials (e.g., paper documents):

If questionnaire responses are returned by mail on paper forms, they will be scanned or recorded in digital form, and the manual material will be destroyed. If the conversion to digital form is delayed, the manual material will be stored in a locked cabinet.

**Protection of digital materials (e.g. information systems and equipment):**

The collection, processing, and storage of the digital research material is done using Tampere University's digital services, which are protected by a username, password, and partly multi-factor authentication (MFA), and with Tampere University's digital device, which is protected with a username and password. The username and password are personal and only known by the person conducting the research.

**Processing of direct identification data:**

Direct identification data are not processed in the research.

**Protecting data in transit:**

Data will not be transferred from the person conducting the research to other persons. The communication between the device and the digital services used in the work takes place using a WPA2-secured network connection. In addition, the device and the digital services are protected by a username and password, and partly by multi-factor authentication (MFA).

**12. Processing of personal data after the research has been concluded**

The research register will be anonymized and archived without personally identifiable data

**Where will the research material be stored and for how long:**

The material without personal data may be archived in the Finnish Social Science Data Archive through which it can be used for study, teaching, and research purposes. Before the material is archived it will be anonymized by categorizing or editing background variables and the content of the open responses or deleting data altogether. The anonymized material remains in any case with the person conducting the research. When anonymized, the material no longer contains personal data and therefore does not form a personal register.

**13. Data subject's rights and possible restriction thereof**

Because no directly identifying personal data, in other words direct identifiers, are collected in the research, it is not possible to identify an individual data subject in the research register. Therefore, it is not possible to realize the following data subject's rights:

- Right to inspect data (right to access personal data)
- Right to correct data
- Right to erase data
- Right to restrict processing
- Right to object
- Right to transfer the data from one system to another

The data subject instead has, where applicable:

- 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 for the Data Protection Ombudsman:**

Office of the Data Protection Ombudsman

Street address: Lintulahdenkuja 4, 00530 Helsinki

Street address: PL 800, 00531 Helsinki

Switchboard: 029 566 6700

Email address: tietosuoja@om.fi

Other contact information: <https://tietosuoja.fi/en/contact-information>