

Aalto University

## **ADVOCACY Privacy Notice**

This privacy notice describes how personal data will be used in the research study.

### **1. What is being studied in this research study and the purpose of processing personal data**

This research study examines the Influence of Business Advocacy in Finnish Employment Relations and Governmental Policies (ADVOCACY). The research aims to understand the impact of business advocacy on employment relations and governmental policies in Finland, by collecting and analyzing policy documents, registry data, semi-structured interviews, and social media data. This privacy notice concerns social media data, public documents and media articles. This research is funded by the Research Council of Finland.

### **2. What personal data is processed in the research study**

The personal data processed in this research study includes:

- Social media and other online posts and comments
- Public documents (e.g. reports, positions, blogs, parliamentary material, working group minutes of meetings, collective agreements)
- Media articles

#### **Special categories of personal data (sensitive personal data)**

The following special categories of personal data are processed:

- ☐ Political opinions
- ☐ Trade union membership

#### **Personal data is collected from the following sources:**

Other: Social media, public documents, media articles

### **3. Processing of necessary personal data and removal of the direct identifiers from the data**

The research study only processes personal data that is necessary for the purpose and execution of the study. The direct identifiers, such as the name, will be replaced with a random identifier when possible. The identity of the individual research participant (person appearing in data) will not be disclosed in a scientific publication or other research results to be published.

## **4. Legal basis for the processing of personal data**

- ☐ The legal basis is scientific research, a task in the public interest

## **5. Sharing personal data**

Research data which consists of personal data, may be transferred to a third party, such as scientific publication, for peer-review process or for other purposes, which is mandatory for scientific publishing or validation of the research results. Research data containing personal data is retained for research data to be used for further scientific research in the same scientific discipline or in other disciplines that support this research study. Research data may also be transferred to other universities or research organisations as part of further research projects.

## **6. International data transfers**

During the execution and analysis phase of research, research data containing personal data will not be transferred to non-EU / EEA countries or international organizations. However, as part of the scientific publishing process, it might be necessary to transfer the data outside EU/EEA for publishers or peer reviewers for verification of research results, as such parties may be located outside EU/EEA area. However, it is exceptional that scientific publication process would require transferring data regarded as personal data.

## **7. Storage and protection of personal data**

Information processed in IT systems: Personal data is processed and preserved in secure IT systems, approved by Aalto University and suitable for personal data.

The research data may be archived to a repository with restricted access so that it is accessible only to parties who have been granted a permit for a purpose compatible with the original purpose for processing.

## **8. Retention and deletion of personal data**

### **Deletion during and after the study**

Research data containing personal data is retained for research data to be used for further scientific research in the same scientific discipline or in other disciplines that support this research study. Research data containing personal data is deleted after five (5) years since the last publication where this research data has been used and exploited. Data minimization of the research data is described in section 3.

## **9. Rights of the research participant**

According to the General Data Protection Regulation (GDPR), a data subject has the right to:

- receive information on the processing of their personal data

- right to access the personal data collected and processed
- right to rectification of inaccurate personal data
- request that the processing of personal data be restricted
- object the processing of personal data
- right to erasure of personal data if the conditions of Article 17(1) of the Data Protection Regulation are met and processing is no longer necessary for archiving purposes in the public interest or for scientific research or statistical purposes in accordance with Article 89(1)

If the research purpose does not require, or no longer requires the identification of the data subject, the controller shall not be obliged to obtain further information so that the data or the data subject may be identified only for purposes to enable the data subject to exercise his/her rights. If the controller is unable to link the data to a particular data subject, the data subject does not have the right to access or correct the personal data, object the processing, or delete the personal data. However, if the data subject provides additional information that allows their identification from the research data, the rights will not be restricted.

## **10. Contact details of the controller**

The controller of this research study is Aalto University Foundation sr., operating as Aalto University.

### **Person in charge of the research study**

Questions regarding the conduct of the research study may be addressed to the person in charge of the study: Paula Koskinen Sandberg, [paula.koskinensandberg@aalto.fi](mailto:paula.koskinensandberg@aalto.fi) +358505122684.

### **Data Protection Officer**

If the research participant has questions or requests related to data protection or the processing of personal data, the research participant should contact the Data Protection Officer of Aalto University: tel. +358 9 47001 (exchange), [dpo@aalto.fi](mailto:dpo@aalto.fi).

In this data request service, you can request the exercise of your rights under GDPR from Aalto University as the controller <https://datarequest.aalto.fi/en-US/>.

If a participant of the research study feels that his or her personal data has been processed in violation of data protection legislation, the participant has the right to lodge a complaint with the supervisory authority, the Data Protection Ombudsman's office (read more: <http://www.tietosuoja.fi> ).