Are you handling personal data?

Personal data is any information relating to an identified or identifiable natural person. A natural person is considered identifiable if they can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Steps of Handling Personal Data in Research

1. Plan and train
2. Prepare legal documents
3. Consider ethical pre-reviews
4. Collect the data
5. Analyse the data
6. Share and preserve the data

1 Plan and train

help available: researchdata@aalto.fi

Research Plan

Prepare your Research plan. This outlines your research topic and objectives as well as the theoretical background and methods used. The format of a research plan may vary depending on whether you are preparing it for an external funder or as a part of your doctoral studies.

Funder-specific advice on plan

Guidelines for doctoral research plan

Data Management Plan

Prepare your DMP plan. A Data Management Plan is a document that maps out how research data is handled during and after a research project. It outlines where data will be stored, how it will be organised, whether there are any ethical or legal issues to consider, if the data will be published and if there are any commercialization concerns.

DMP guidance

Training

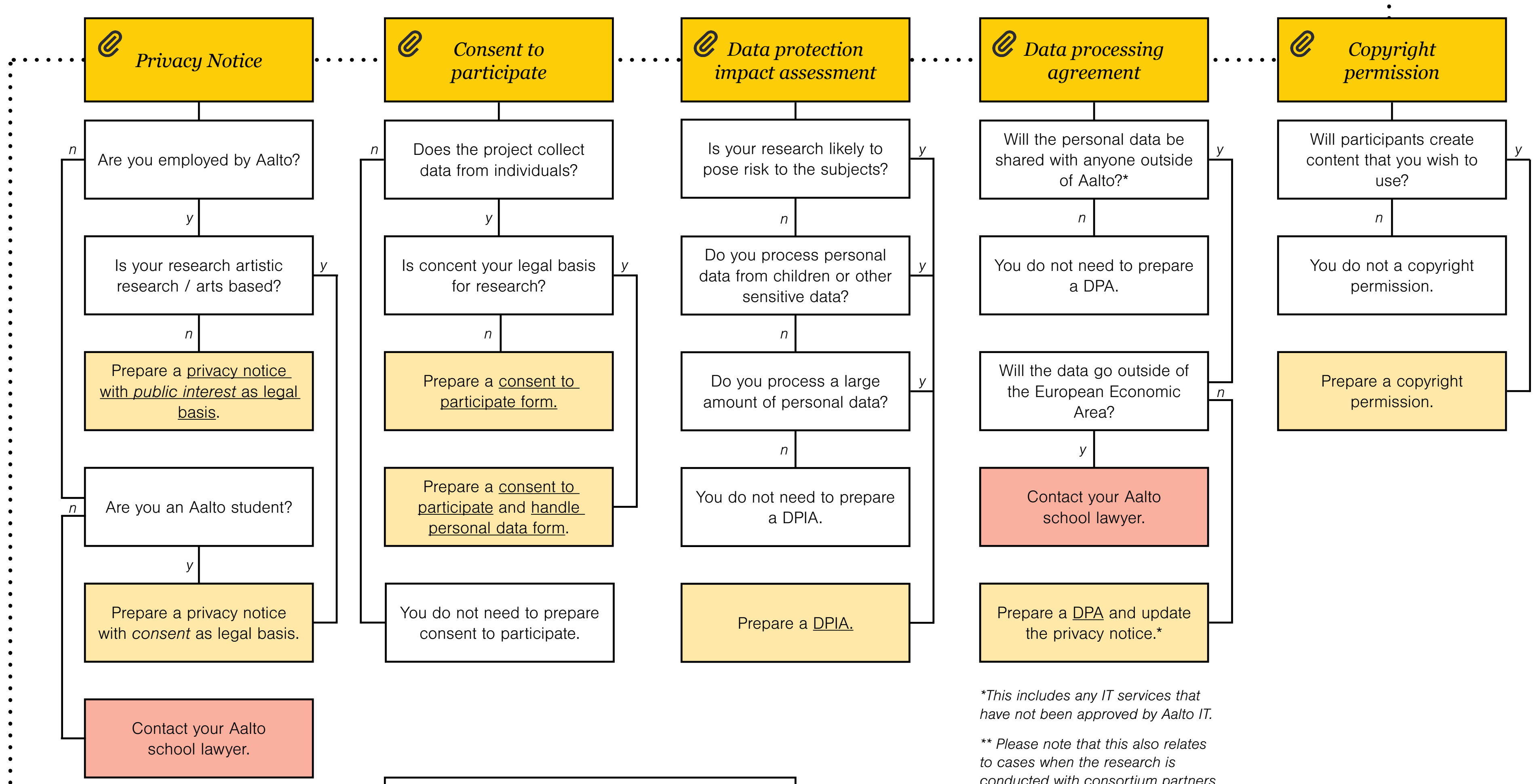
Be sure to complete the Aalto training on personal data as well as the Aalto IT Security training.

Training on personal data

IT security training

2 Prepare legal documents

help available: your school lawyer



Privacy Notice

Are you employed by Aalto?
- y: Is your research artistic research / arts based?
  - n: Prepare a privacy notice with *public interest* as legal basis.
  - y: Prepare a privacy notice with *consent* as legal basis.
- n: Are you an Aalto student?
  - y: Prepare a privacy notice with *consent* as legal basis.
  - n: Contact your Aalto school lawyer.

Consent to participate

Does the project collect data from individuals?
- y: Is concent your legal basis for research?
  - n: Prepare a consent to participate form.
  - y: Prepare a consent to participate and handle personal data form.
- n: You do not need to prepare consent to participate.

Data protection impact assessment

Is your research likely to pose risk to the subjects?
- y: Prepare a DPIA.
- n: Do you process personal data from children or other sensitive data?
  - y: Prepare a DPIA.
  - n: Do you process a large amount of personal data?
    - y: Prepare a DPIA.
    - n: You do not need to prepare a DPIA.

Data processing agreement

Will the personal data be shared with anyone outside of Aalto?*
- n: You do not need to prepare a DPA.
- y: Will the data go outside of the European Economic Area?
  - y: Contact your Aalto school lawyer.
  - n: Prepare a DPA and update the privacy notice.*

**This includes any IT services that have not been approved by Aalto IT.*

*** Please note that this also relates to cases when the research is conducted with consortium partners from other organizations. There might be "joint controllership" of the personal data. Please discuss this with your Aalto School lawyer.*

Copyright permission

Will participants create content that you wish to use?
- n: You do not a copyright permission.
- y: Prepare a copyright permission.

Once necessary legal documents are ready, send them to your school lawyer for checking

3 Consider ethical pre-reviews

help available: Ethics Committee Secretary

Familiarize yourself with ethical risk assessment

Ethical pre-reviews help ensure that the research plan follows ethical practices and does not pose harm to the subjects. Not all projects require a review. However, ethical risks can also happen when no data from individuals are processed or even with fully anonymized data. Sometimes a statement from the ethics committee is needed by the publishers even though no ethical risks are present in your project. Depending on the case, the pre-review is done by the Aalto Research Ethics Committee or the HUS Ethical Board for Medical Research.

Click here to find out whether you need an ethical pre-review

Aalto ethical pre-review (full process)

This process is for non-medical research which relates to human sciences. It can only be done **before** the data is collected. Allow at least a month for the review process.

Details of this process

Aalto ethical pre-review (concise process)

This process is for research that requires an ethical statement solely for funders or publishers, or where data on Aalto university students or teaching is used for research. It can only be done **before** the data is collected.

Details of this process

HUS ethical pre-review

This process is for medical research. It can only be done **before** the data is collected. Allow at least a month for the review process.

Details of this process

4 Collect the data

help available: researchdata@aalto.fi

Maintain data safety during collection

Publish your Privacy Notice, either on the project website or by sending it to tietosuojailmoitukset@aalto.fi. If there are any changes to the conditions in which personal data is processed, inform the participants and update the documents. Use only Aalto-recommended data collection solutions and implement data quality assurance. Prepare a process for dealing with incidental findings (retain direct identifiers until quality assurance has happened, then minimize). Implement data protection solutions such as personal data minimization, encryption and secure storage. Refer to your DMP regarding safe storage and handling of data and update the plan as needed.

5 Analyse the data

help available: rse-group@ aaltofi

Get the right tools for analysis

For analysing your data, use recommended Aalto computational resources according to the level of sensitivity of your data and your storage and computational speed needs. If you need help with research software, coding or large scale computational analyses, get in touch with a Research Software Engineer.

6 Share and preserve the data

help available: researchdata@aalto.fi

Consider whether your data be opened

Decide if your research data can be published. If the data itself cannot be published, the metadata about the data should be made openly available and FAIR. Long term preservation might be in contrast with data protection. However, it is possible to have data available with data access control solutions: e.g. with federated access (EGA, CSC SD Submit). Highly valuable dataset should find solutions for long term preservation and easy reusability while ensuring data protection.

Advice on opening data

Pseudonymised data

Pseudonymising data means removing parts of the data so that an individual can no longer be identified without the use of additional information. For example, encoding the data i.e. giving participants false names and having a code key to identify subjects. Pseudonymised data is still personal data and is subject to data protection regulations.

Information on pseudonymised data

Anonymised data

Anonymising means processing personal data so that it is absolutely impossible to identify the individuals. This process is permanent and cannot be reverted. Keep in mind that it may take just a few indirect identifiers to identify a person. Anonymised data is no longer considered personal data and is no longer subject to data protection regulations.

Information on anonymised data

Aalto University

If you run into any questions or are faced with issues regarding handling personal data, help is available at researchdata@aalto.fi