

## **Privacy Notice for the “Analysis of the evaluation summary reports of funding proposals” Research Study**

You have been invited to participate in this development project by sending us data for the study. Participation in this study is voluntary. You can discontinue your participation in the study at any time by contacting us. Should you discontinue your participation, you will not be subject to any negative consequences.

You are part of this study also if you have given us data as part of a previous similar study or as part of our daily work. Even in this case, you can discontinue your participation in the study at any time by contacting us. Should you discontinue your participation, you will not be subject to any negative consequences.

This privacy notice describes the use of your data.

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

**The subject of this study is:** This development project will train a semantic AI tool to extract and group comments from evaluation summary reports of funding proposals. Such comments will be then analyzed by the pre-award services to write a set of best practices for proposal preparation for Academy of Finland and EU proposals.

#### **Reasons for processing personal data and the purpose of this study:**

The goal of the study is to prepare sets of best practices for proposal preparation for Academy of Finland and EU proposals based on the common pitfalls identified from the evaluation summary reports of Aalto’s proposals.

Your personal data is not used in the study per se, but some personal data is included in the evaluation summary reports as the funding agencies provide them.

**Your role in this study:** You are involved in this study when the evaluation summary report of a proposal in which you are a PI (Principal Investigator) is analyzed as part of the study. As an Aalto researcher, you can contribute to the study by sending us the evaluation summary reports of your Academy of Finland and EU proposals. You are part of this study also if you have given us the evaluation summary report of a proposal in which you are a PI for a previous similar study or as part of our daily work.

As an evaluator, you are involved in this study if an evaluation summary report to which you have contributed is included in the study.

**Research funding:** This research is funded by Aalto University (as part of the normal operations of the RES Pre-award team and IT services).

### **2. Personal data will be collected from the following sources:**

Personal data is included in the Academy of Finland evaluation summary reports collected from Aalto's researchers that acted as a PI in the proposals. The evaluation summary reports included in this study will start from the year 2016 until now. They will include the Academy September call and programmatic calls, but not the Strategic Research Council calls.

For the evaluation summary reports of the EU proposals included in this study (H2020 and Horizon Europe excluding ERC and MSCA individual fellowships), the PI name is not indicated in the report.

### 3. **What personal data is processed?**

We will not intentionally analyse any personal data in the study, but personal data are present in the summary reports as the funding agencies provide them. This means that we will store personal data to access other data included in the same report. The direct identifiers included are:

- For the Academy of Finland reports, the name of the PIs of the proposal
- For most Academy of Finland reports, the name of the evaluation panel members (or in rare cases, the name of the evaluators)

### 4. **How is personal data minimized in the study?**

We do not collect any additional personal data, but they are included in the pdf from which we want to extract other data (in the case of the Academy of Finland). The evaluation summary reports are standard forms delivered as such by the funding agencies. No minimization is deemed necessary.

### 5. **Legal basis for processing of personal data**

The legal basis for processing personal data is legitimate interest.

#### **Legitimate interest assessment**

Aalto University researchers will benefit from the best practices for proposal writing derived from the analysis of the summary reports. We hope to recognize some common pitfalls to be proactive in our advice to the researchers. The goal is to support Aalto University in securing external research funding. Analyses of the summary reports are common in research institutions, so it is reasonable to expect that data from the evaluation summary report are used in the way contemplated by this study.

#### **Possible risks:**

One may think that there could be a negative impact on a researcher's career if a negative evaluation summary report is leaked. We consider this risk as minor. An unfavourable evaluation of a single proposal has nothing to do with the value of that researcher, and we do not see in which way it may negatively impact that researcher's career. All researchers have failed proposals in their history, and it is by failing that they improve their grant writing skills.

#### **Mitigation measure:**

We will limit the number of people who access the reports to the Pre-Award team (which also in their regular work treats evaluation summary reports confidentially) and the people from IT who work on the project (currently 2). The reports are stored according to Aalto IT guidelines. Only the project's coordinating researcher can grant access rights to the storage folder in which reports with personal data are stored.

The types of comments are general, and the volume of data so large that it will be impossible for anyone to recognize any of the researchers behind the analysis results.

For the evaluators, even in the case of the Academy of Finland when the panellist's names are included in the report, we do not see any risks as there is nothing about them in the evaluation summary report.

On balance, we conclude that it is justified to process personal data as explained in this privacy notice, as the processing is important to improve our pre-award service to the researchers and to understand how Aalto University could succeed better in gaining external research funding, while it has only a minimal impact on the rights and freedoms of data subjects.

## 6. **Sharing of Personal Data**

Third-party collaborators will NOT have access to personal data.

## 7. **Transfer of Personal Data to Non-EU/EEA countries**

Personal data is not transferred to non-EU/EAA countries.

## 8. **Storage period of your data and anonymization**

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**Coordinating researcher:** Claudia Dell'Era, Dr.Sc., Senior Grant Writer, [claudia.dellera@aalto.fi](mailto:claudia.dellera@aalto.fi) , +358 50 441 1407

**Research data storage:** Until the development and analysis is completed. At the latest, by the end of 2023, we will delete all evaluation summary reports collected for this analysis and containing personal data from the storage folder. We may collect new reports for new analyses in the future.

## 9. **The rights of the study participant in a scientific study**

According to the General Data Protection Regulation (GDPR), subjects have the right:

- to obtain information on the processing of their personal data
- of access to their data
- to request rectification of their data
- to request restricting the processing of their data
- to object to the processing of their data
- right to erasure, if the grounds of article 17.1 of GDPR apply and if processing is no longer needed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right to erasure is not likely to render impossible or seriously impair the scientific research.

If the purposes for which a controller processes personal data do not or do no longer require the identification of a data subject by the controller, the controller shall not be obliged to maintain, acquire or process additional information in order to identify the data or the data subject for the sole purpose of complying with the GDPR. If the controller cannot identify the data related to a data subject, the rights of

access, rectification, objection and erasure shall not apply, except if the data subject provides additional information enabling his or her identification and the identification of the research data that relates to data subject.

Data is being processed for the purposes of this development study, and the data is not used in decision-making related to the participant.

To exercise his or her rights, the data subject should contact the Data Protection Officer of Aalto University, or the research study contact person.

- In the case of the Academy of Finland evaluation summary reports, if the data subject asks to discontinue their participation, we will remove and not use the data subject's data in the research.
- In the case of the EU evaluation summary reports, if the data subject asks to discontinue their participation, we will remove and not use the data subject's data in the research if the data subject can provide the acronym or proposal indicator for their proposal(s). (The EU evaluation summary reports do not include any indicator of the identity of the researchers from which we could otherwise identify the data subject).
- If the data subject contacts us once the research is fully completed, we cannot at that stage anymore identify and remove the data subject's data since the data is then fully anonymised.

#### 10. **More information on the study and the exercising of your rights**

The controller in this study is Aalto University.

The contact person in matters related to the research study:

**Coordinating researcher:** Claudia Dell'Era, Dr.Sc., Senior Grant Writer, [claudia.dellera@aalto.fi](mailto:claudia.dellera@aalto.fi) , +358 50 441 1407. Aalto Research Services, Pre-Award Team.

The research participant must contact Aalto University's data protection officer if they have questions or demands related to the processing of personal data.

Data Protection Officer Anni Tuomela +358947001 [dpo@aalto.fi](mailto:dpo@aalto.fi)

In this customer service portal, you can make requests personal data requests based on your rights [Home Consent Management \(aalto.fi\)](#) .

If the research participant sees that their data has been processed in violation of the General Data Protection Regulation or data protection legislation, the participant has the right to lodge a complaint with the supervisory authority, the Data Protection Ombudsman (see more: tietosuoja.fi).