

**DATA PROTECTION NOTICE FOR  
SCIENTIFIC RESEARCH  
General Data Protection Regulation of the EU  
Articles 12–14  
Date: 30.6.2023**

**Information on the processing of personal data in the research project entitled  
DAGIS project**

The research project entitled DAGIS involves processing of personal data. The DAGIS project includes multiple sections, such as DAGIS Next and DAGIS Salo. The purpose of this data protection notice is to provide information on the personal data to be processed in the whole DAGIS project, from where they are obtained and how they are used. Detailed information on the rights of data subjects will be provided at the end of this notice.

Your participation in the research project and provision of personal data are voluntary. If you do not wish to participate in the project or you wish to withdraw from it, you can do so without negative consequences.

**1. Data controller**

Samfundet Folkhälsan i svenska Finland r.f. ("Folkhälsan")  
Address: PL 211 (Topeliuksenkatu 20), 00251 Helsinki

University of Helsinki  
Address: PL3 (Fabianinkatu 33), 00014 University of Helsinki

University of Eastern Finland  
Joensuu campus, Yliopistokatu 2, 80100 Joensuu  
PL 111, 80101 Joensuu

The above-mentioned organisations function as joint data controllers, that is, they jointly determine the purposes and means of personal data management.

**2. Contact person and principal investigator**

Contact person in matters concerning the research project: Eva Roos  
Name: Eva Roos  
Address: Folkhälsan, Topeliuksenkatu 20, 00250 Helsinki  
Phone: 0504076382  
Email: [eva.roos@folkhalsan.fi](mailto:eva.roos@folkhalsan.fi)

Principal: Eva Roos

### **3. Contact details of the data protection officer**

The data protection officer for Folkhälsan is principal solicitor Johan Huldén. They can be reached via email [dataskydd@folkhalsan.fi](mailto:dataskydd@folkhalsan.fi)

The data protection officer for University of Helsinki can be reached via email [tietosuoja@helsinki.fi](mailto:tietosuoja@helsinki.fi)

The data protection officer for University of Eastern Finland is Helena Eronen, email: [tietosuoja@uef.fi](mailto:tietosuoja@uef.fi), phone 050 576 0282.

### **4. Description of the research project and the purpose of processing personal data**

The DAGIS project is a multiphase follow-up research project started in 2014, the various sections of which have involved a total of 1,700 children and their caregivers so far. The research material has been/is collected from crèches and their personnel from 10 municipalities in Uusimaa, Varsinais-Suomi, Kanta-Häme, Etelä-Pohjanmaa, and from schools in Salo. The purpose of processing personal data in the DAGIS project is to examine and follow-up children's health behaviour and weight, and determining factors at home, at crèche, and at school. The research themes include food consumption, physical activity, screen use, sleep, stress, recovery, self-regulation, and learning. Not all themes are research from all participants.

### **5. Study investigators**

The study is carried out by Eva Roos' research group in Folkhälsan Research Centre, Maijaliisa Erkkola's research group in the department of Food and Nutrition Science in University of Helsinki, and Nina Sajaniemi's research group in the department of Applied Educational Science and Teacher Education in University of Eastern Finland. Personal data is processed within research groups by researchers and research assistants.

### **6. Personal data included in the research data**

The research material includes participants' (children's, their caregivers' and crèche and school personnel's) direct identifiers: names and contact details as well as the true data which consists of information concerning the children, families, homes, caregivers, crèches, and schools.

Personal data concerning the child consists of information about their food consumption, physical activity, stress, recovery, health, weight and height, temperament, self-regulation, and learning as well as hair and saliva cortisol and alfa-amylase contents.

Data concerning the family and the caregivers consists of information about health behaviour factors at home, caregivers' food consumption, family's socioeconomic status, and other background information, such as the number of siblings.

Data concerning the crèches consists of information about the crèche's and the crèche groups' physical environment, personnel's, crèche's and crèche groups' activities as well as personnel's attitudes concerning children's health behaviour.

Data concerning the schools consists of information about the schools' background, physical environment, and practices relating to physical activity and meals.

## **7. Sources of personal data**

Data concerning the participants is collected from the participants themselves, their caregivers, and the crèche and school personnel by questionnaires, meters (ie. accelerometers), and interviews.

## **8. Sensitive personal data**

The following special categories of personal data (i.e., sensitive data), as defined in Article 9 of the GDPR, will be processed in this research:

- ☐ Racial or ethnic origin
- ☐ Political opinions
- ☐ Religious or philosophical beliefs
- ☐ Trade union membership
- ☐ Genetic data
- ☐ Biometric data for the purpose of uniquely identifying a natural person
- ☒ Health
- ☐ Sex life or sexual orientation of a natural person

The processing of sensitive personal data is based on Article 9(2)(j) of the General Data Protection Regulation (processing is necessary for scientific research purposes), as well as Section 6, Subsection 1, Paragraph 7 of the Finnish Data Protection Act.

☐ Personal data concerning criminal convictions or offences will be processed in the research project.

The processing of data concerning criminal convictions or offences is based on Section 7, Subsection 1, Paragraph 2 of the Finnish Data Protection Act (the processing of personal data concerning criminal convictions or offences or related security measures is allowed for scientific research purposes).

## 9. Lawful basis for processing personal data

Personal data are processed on the following basis (Article 6(1) of the GDPR):

☒ Task carried out in the public interest::

☒ Scientific or historical research purposes or statistical purposes

☐ Archiving of research material and cultural heritage material

☐ Consent by the research subject\*

☐ Compliance with a legal obligation to which the controller is subject

☐ Legitimate interests pursued by the controller or by a third party

Specify the legitimate interest:

If the processing of personal data is based on the research subject's consent, he or she can withdraw that consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

\*) In DAGIS studies that started before 2018, the basis for processing personal data has been the research subject's consent. In compliance with the current recommendations, the basis of processing personal data in all DAGIS studies is task carried out in the public interest.

## 10. Recipients of data

The participants' personal data are temporarily stored in Webropol Oy secure servers for data collection purposes. No direct identifiers are disclosed to parties outside the DAGIS project. Other research material may be disclosed to research partners with aligning objectives to the DAGIS project with the board's decision. Inside the EEA, the research material can be disclosed pseudonymised, that is, encoded without direct identifiers thus protecting your identity. No data recipients are known at the time of drafting the data protection statement. Potential recipients include universities and other research institutions. Disclosing personal data outside the research group requires a research partner contract and an information disclosure contract.

## 11. Data disclosure outside the EEA

No personal data is disclosed outside the EEA. Outside the EEA, the research material can only be disclosed anonymised, that is, without the research code or direct identifiers. Data is thus no longer considered personal data.

## **12. Automated decision-making**

The research project involves no automated decision-making that has a significant effect on data subjects.

## **13. Protection of personal data**

Personal data included in the research dataset will be processed and kept protected so that only those who need the data can access them. The pseudonymisation code key is stored separately from other data.

The data processed in data systems will be protected using the following:

☒ Username and password

☐ Registration/log of use

☐ Access control

☒ Encryption

☐ Two-factor identification

☐ Other, please specify:

Physical material, such as data in paper form or other tangible form, will be protected using the following: data in paper form or other tangible form is stored in a locked cupboard in a locked facility that can be accessed by authorized persons alone.

Processing direct identifiers:

☐ The controller collects the personal data without direct identifiers.

☒ Direct identifiers will be removed during the analysis stage and kept separate from the analysed research data.

☐ The data will be analysed using direct identifiers, because:

## **14. Duration of the processing of personal data in this research project**

The research project in question is a follow-up study of many years. Personal data is processed for as long as the study is ongoing (estimated until 2033) and kept after the study completion for at least 10 years for result validating purposes. The board will decide on the continuation of the project and assesses data storage needs every 3 years since the study completion.

## **15. Processing of personal data when the research project ends**

☐ The research data will be deleted

☒ The research data will be kept for the purposes of validating or replicating the results of this research project:

☒ without identifiers ☐ identifiers included

☒ The research data will be kept for later, compatible scientific research in accordance with the requirements of the GDPR:

☒ without identifiers ☐ identifiers included

The storage of the research data is based on Article 5(1)(b) and (e) of the GDPR.

Data subjects will receive a new data protection notice on the new use of the research data, unless the controller can no longer identify the subjects from the data.

In addition, the data subjects will not be informed of the new research if delivering this information to them is impossible or involves a disproportionate effort or renders impossible or seriously impairs the achievement of the research objectives (Article 14(5)(b) of the GDPR).

The research data is kept in register holders' (Folkhälsan, University of Helsinki, University of Eastern Finland) servers appropriately secured until 2043. At the project's completion, the research data is anonymised and handed over to the Finnish Social Science Data Archive for research and educational purposes. Electronic and paper form data possessed by the register holders will be destroyed.

## **16. Rights of data subjects and derogations from those rights**

The contact person in matters related to research subjects' rights is the contact person stated in section 1 of this notice (principal investigator Eva Roos).

### **Rights of data subjects**

Under the General Data Protection Regulation, data subjects have the following rights:

- Right of access to their own data
- Right to rectification of their data
- Right to the erasure of their data and to be forgotten
- Right to the restriction of processing of their data
- Right to data portability from one controller to another
- Right to object to the processing of their data
- Right not to be subject to automated decision-making

However, data subjects cannot exercise all their rights in all circumstances. The circumstances are affected by, for example, the legal basis for processing personal data.

Further information on the rights of data subjects in various circumstances can be found on the website of the Data Protection Ombudsman: <https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>.

### **Derogations from rights**

The General Data Protection Regulation and the Finnish Data Protection Act enable derogations from certain rights of data subjects if personal data are processed for the purposes of scientific research and the rights are likely to render impossible or seriously impair the achievement of the research purposes.

The need for derogations from the rights of data subjects will always be assessed on a case-by-case basis.

### **Right to appeal**

If you consider that the processing of your personal data has been carried out in breach of data protection laws, you have the right to appeal to the Office of the Data Protection Ombudsman.

Contact details:

Office of the Data Protection Ombudsman  
Street address: Ratapihantie 9, 6<sup>th</sup> floor, 00520 Helsinki  
Postal address: PO Box 800, 00521 Helsinki  
Phone (switchboard): 029 56 66700  
Fax: 029 56 66735  
Email: tietosuoja(at)om.fi