DATA PROTECTION POLICY/STATEMENT FOR SCIENTIFIC RESEARCH
EU General Data Protection Regulation 12–14 articles
Date of preparation: 03.03.2026

The privacy notice has been updated following the relocation of the international SUNRISE study coordination centre to Canada. Furthermore, the notice has been reviewed and updated throughout as part of a routine periodic review.

Information on the processing of personal data in the SUNRISE Finland Study

The SUNRISE Finland study uses personal data as material for the study. The purpose of this statement is to provide information on the processing of personal data, where the personal data originated and how it is used in the research. It also describes the legal rights of the participant related to the processing of their personal data.

Participation in the study and the provision of personal information is voluntary. No negative consequences will arise for you and/or your if you do not participate in the study or suspend your participation in the study. Please note that consent to participate in the study is not equivalent to consent for the processing of personal data. The processing of your and/or your child’s personal data is based on the public interest legal basis rather than consent; see section 9 below for further information.

1. Data controller of the study

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

2. Contact person and responsible researcher

Contact person for data protection matters concerning research:
Eva Roos
PO 211, Topeliuksenkatu 20, 00251 Helsinki
+358 50 407 6382, eva.roos@folkhalsan.fi

Responsible researcher: Eva Roos

3. Data protection officer

Folkhälsan's data protection officer is Johan Huldén, general counsel, and can be contacted via email at: dataskydd@folkhalsan.fi

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

The purpose of processing personal data is the implementation of the SUNRISE Finland study. The purposes and means of the study are described below.

The SUNRISE Finland study is part of the International Study of 24-Hour Movement Behaviour in the Early Years: The SUNRISE Study –research, which currently includes over 60 countries. The aim of the SUNRISE-project is to collect information about physical activity, sedentary screentime and sleep, as well as motor and cognitive skills of children under school age. The study examines the proportion of 3-4-year-old children who meet the World Health Organization (WHO) recommendations for physical activity, sedentary screen time and sleep. The results of the project will increase knowledge about children's health behaviour and the factors affecting it. Such knowledge will help to improve children's health and well-being and promoting social equality. The information obtained can be utilized for health promotion work and as a basis for developing new recommendations and practices for children under school age. In Finland, the research was carried out in Helsinki, Espoo, Turku, Kuopio and Oulu urban areas and in rural areas close to these cities. A total of 1,081 children were recruited, of which 57% came from urban areas and 43% from rural areas.

We also examine which factors are associated with children’s movement behaviours and their motor and cognitive skills (working memory and executive functions). We focus in particular on differences related to sex, family socioeconomic status, and rural versus urban living environments, as well as on parents’ lifestyles and mental health symptoms.
In addition, using address data and geographic information systems (GIS), we investigate whether characteristics of children’s residential and early childhood education and care environments (including natural and built environments) are associated with children’s movement behaviours.

Later, we will examine the association of sociodemographic factors (such as relocation, educational data, income, and address data) and child and parental health factors (such as illness and medication) with children’s movement behaviour, weight, and motor and cognitive skills by using data collected from national registries. Such data is classified as sensitive under the Data Protection Regulation and will be handled with particular care during processing. In order to use the data from the registry, we ask for the social security number of the respondents in the questionnaire, and it is optional to provide it. In addition, permission is sought from the authorities (Findata) for the use of register materials. We will send invitations to follow-up studies to children and parents participating in the SUNRISE Finland Study in the future. In follow-up studies (the first one starting in 2026-2027), we will examine, for example, the movement behaviour of the children when they are older. We will provide more information about registry and follow-up studies via email and on our website when they are current. We will apply for ethical evaluations for both registry and follow-up research before they are conducted. Participants have the opportunity to decline to participate in registry and follow-up studies at any time.

5. Executors of the study

The study investigators are responsible for ensuring the study’s compliance and for addressing data subjects’ questions concerning the processing of personal data within the study.

The study is conducted at the Folkhälsan Research Center (Samfundet Folkhälsan i svenska Finland r.f.). The data collection phase of the study was overseen by the principal investigator Eva Roos, the study’s second principal investigator Elina Engberg, and the data collectors. The production, quality assurance, and archiving of the data are carried out by research assistants, research coordinators, and researchers.

Part of the study is conducted in collaboration with the international SUNRISE research consortium, for which the University of Alberta (Canada) has served as the lead organization since 9 November 2025 under the leadership of Professor Valerie Carson. The previous international coordination center for the SUNRISE study was located at the University of Wollongong in Australia. Collaboration with this center continues; however, primary responsibility now lies with the Carson research group in Canada. The main analyses of the SUNRISE Finland study are conducted in Finland within Elina Engberg’s research group at the Folkhälsan Research Center.

The University of Alberta acts as an independent data controller to whom Folkhälsan discloses your data solely in pseudonymised form, i.e. without information enabling the identification of you or your child. In its role as an independent data controller, it is responsible for the lawful processing of the data transferred to it and for compliance with the obligations set out in the General Data Protection Regulation; however, responsibility for providing information to you and for facilitating your rights remains with Folkhälsan.

6. What personal data are included in the research dataset and how are they processed

At the daycare centre, children’s height, weight, and waist circumference were measured. Physical activity, sedentary behaviour, and sleep were assessed using accelerometers, motor skills were assessed using five different tests, and cognitive skills were assessed using two tablet-based games. The data collected from the children have been stored and are processed (e.g., analyzed) in research at Folkhälsan. In addition, the data have been transferred to the international coordination center.

In addition, information was collected from children’s parents/guardians using two questionnaires. One questionnaire was part of the international SUNRISE study and was completed by only one of the child’s parents/guardians, while the other questionnaire related to the Finnish component of the SUNRISE study and could be completed by all participating parents/guardians. In the questionnaire related to the international SUNRISE study, parents were asked about the child’s sleep, use of digital media, and eating habits, as well as sociodemographic factors and their own use of digital media. These data have been stored in Folkhälsan and transferred also to the international coordination centre.

In the questionnaire related to the Finnish component of the SUNRISE study, information was collected, among other things, on the respondent’s and the child’s home address and personal identity code. Information was also collected on the child’s sleep, use of digital media, time spent in nature, and assessment of physical fitness. In addition, the questionnaire collected information on the parent’s sociodemographic factors, physical activity, use of digital media, sleep, mental health symptoms, and perceived well-being. These data have not been transferred to the international coordination centre, but are stored at the Folkhälsan Research Center.

The data collected later from the registers relates to socio-demographic factors such as relocation, income and education, as well as health-related factors such as diseases (diagnoses) and prescriptions.

7. Sources of personal data collected

Data were collected on paper (activity monitor diary) and electronically (parental questionnaire for the Finnish SUNRISE project and a parental questionnaire belonging to the international SUNRISE project). Children's data were also collected through measurements and tests performed at the daycare centre and with accelerometers. Later, the data of children and parents will also be combined from registers for which the registrars are Digital and Population Data Services Agency, Statistics Finland, Social Insurance Institution of Finland (KELA), Kanta Services (The Social Insurance Institution of Finland), Finnish Institute for Health and Welfare (THL) and public and private service providers for social and health care, for those participants who provided their social security number.

8. Sensitive personal data

The research deals with the following specific categories of personal data (i.e. sensitive personal data) pursuant to Article 9 of the EU General Data Protection Regulation (GDPR):

☒ 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
☒ Data concerning health
☐ Data concerning a natural person’s sexual behavior or orientation

The processing of sensitive data is based on Article (9) Section (2) subsection of the GDPR (processing is necessary for scientific research purposes), and on Article (6) Paragraph (1) Section (7) of the Finnish Data Protection Act (Article (9) Section (1) of the GDPR does not apply to the processing of personal data for scientific research).

☐ The research will address criminal conviction or misdemeanor information.

The processing of information concerning criminal convictions or breaches is based on Article (7) Subsection (1) Paragraph (2) of the Finnish Data Protection Act (personal data relating to criminal convictions and violations or related security measures referred to in Article (10) of the GDPR may be processed if processed for scientific research).

9. Legal basis for processing personal data

Personal data is processed on the following basis in accordance with Article (6) section (1) of the GDPR:

☒ task of public interest:

☒ scientific or historical research or statistics (data protect regulation Article (4) section 3)
☐ archiving of research materials and heritage materials (data protector Article (4) section (4))
☐ consent of the participant
☐ compliance with the regulatory obligation of the data controller
☐ realization of the legitimate interests of the controller or third party
what legitimate interest is at stake:

If the processing of personal data is based on the consent of the subject, the subject shall at any time have the right to withdraw their consent. The withdrawal of consent does not affect the legality of the processing carried out before withdrawal. Please note that consent to participate in the research is distinct from consent to the processing of personal data.

10. Data recipients

Part of the data collected in the study is processed in pseudonymised form in the research group led by Valerie Carson at the University of Alberta (Canada), which currently acts as the main responsible organisation for the SUNRISE study. This data includes the parental questionnaire belonging to the international SUNRISE study and the results of measurements taken from children (height, weight, waist circumference, data on gross and fine motor skills, cognitive skills, muscle strength of the upper and lower limbs, as well as physical activity, sedentary behaviour, and sleep measured with two accelerometers).

Since this is an international research collaboration, some data belonging to the international research may also be shared with SUNRISE research groups in other countries, for example the Spanish SUNRISE research group. In addition, data may, where necessary, be shared with other collaboration partners and service providers for the purpose of achieving the objectives of the research project, such as:

To examine the characteristics of the participants' residential and daycare environments (including natural and built environments) using a geographic information system (GIS), we have shared address data with researchers at the Oulun Diakonissalaitoksen Säätiö rs. The processing of the data has been agreed upon in a collaboration and data transfer agreement.

In this study, we use IT service providers who act as processors of personal data in accordance with our instructions.

The research material can be used, for example, in theses in the field of exercise, nutrition, psychology or behavioural sciences. The responsible researchers in charge grants the right to process the research material (pseudonymized) to other researchers / students. The purpose of any externally disclosed data must be compatible with the objectives of the SUNRISE Finland study.

11. Transfer of data outside the European Economic Area

When transferring the collected data to the international coordination centre outside the European Economic Area, the European Union's General Data Protection Regulation (GDPR, General Data

Protection Regulation) is taken into account. Data may also be shared for collaborative purposes with other countries outside the EEA, in addition to Australia and Canada. The collected data are pseudonymised prior to transfer so that the research participants cannot be identified on the basis of the data. A collaboration agreement is always concluded with the recipients, covering intellectual property rights to the data, the use of the data, confidentiality, protection of privacy, and the roles and responsibilities of each party in the processing of personal data.

If the recipient country has not been granted an adequacy decision by the European Commission (such as Australia and Canada do not have) the transfer of data is based on the European Commission's standard contractual clauses, under which the recipient of the personal data undertakes to comply with the data protection requirements set out in the clauses:

https://ec.europa.eu/info/law/law-topic/data-protection/ international-dimension-data-protection/standard-contractual-clauses-scc_en

12.Automated decision-making

No automatic decisions are made in the study.

13. Protection of personal data

The personal data contained in the research material is processed and stored in such a way that only those who need it can view the data.

Data processed in information systems is protected in the following ways:
☒ username and password
☐ registration of use/log data
☒ access control
☐ encryption/crypting
☐ two-factor authentication
☒ other, what: pseudonomised

Direct identifiers processing:
☐ Data controller collects personal data without direct identification
☒ Direct identifiers are deleted during the analysis phase and stored separately from the research material to be analysed
☐ Data is analysed with direct identifiers because (criterion for retention of direct identifiers):

14. Duration of personal data processing in this research

Personal data will be actively processed in the research until 2035. After the study has ended, the data will be retained for at least 25 years to enable verification of the research and potential follow-up studies.

15. Processing of personal data after the research

☐ Research data will be disposed

☒ Research data is kept for assessing the reliability of the results of this study:

☐ without direct identifiers ☒ with identifiers

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

☐ without direct identifiers ☒ with identifiers

The retention of the research material is based on Article 5 section (1) subsections (b) and (e) of the GDPR. Prior to use in new research, the controller will ensure that the new research is compatible with the original use of the material in accordance with the requirements of the regulation. A new data protection notice will be sent to data subjects unless the data controller is no longer able to identify the data subjects from the research material.

Notification of a new investigation cannot be sent to the data subject if it will be impossible or unreasonably arduous to provide information or if it would hinder or greatly complicate the achievement of research purposes (GDPR article 14 section (5) subsection (b)).

Where the data is stored and for how long: data is stored in secure databases managed by Folkhälsan behind usernames and passwords for at least 25 years. The need to store the data is regularly assessed.

16. Rights of the data subject and derogation from rights

The contact person in matters relating to the rights of the data subject shall be the person referred to in paragraph 1 of this notice.

Rights of the data subject

According to the GDPR, the data subject has the right to:

- request access to his/her data
- amend his/her data
- delete his/her data and be forgotten
- restrict the processing his/her data
- transfer his/her data from one system to another
- resist the processing of data
- not to be subjected to automatic decision-making

The data subject cannot exercise all rights in all situations. The rights are dependent on, for example, the basis on which personal data is processed.

More detailed information about the data subject's rights in different situations can be found on the Data Protection Supervisor's website: https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations

Application of rights

If the processing of personal data in the research does not require the identification of the data subject and the data controller cannot identify the data subject, the right for verification, correction, deletion, restriction of processing, notification obligation and transfer will not apply, unless the data subject provides additional information enabling identification (GDPR article 11).

Derogation from rights

The GDPR and the Finnish Data Protection Act allow derogation from certain rights of data subjects when personal data is processed in scientific research and the implementation of the rights would greatly impede or make it difficult to achieve the purposes of processing.

The need to derogate from the data subject's rights is always assessed on a case-by-case basis.

Right to appeal

You have the right to lodge a complaint to the Office of the Ombudsman for Data Protection if you think there has been a breach of existing data protection laws in the processing of your personal data.

Contact:
Office of the Data Protection Ombudsman
Visiting address: Lintulahdenkuja 4, 00530 Helsinki
Postal address: PO 800, 00531 Helsinki
Switchboard: 029 56 66700
Fax: 029 56 66735
E-mail: tietosuoja(at)om.fi