

DATA PROTECTION POLICY/STATEMENT FOR SCIENTIFIC RESEARCH**EU General Data Protection****Regulation 12–14 articles****Date of preparation: 7.4.2022****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. You are not subject to any negative sanctions if you do not participate in the study or suspend your participation in the study.

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

Name: Eva Roos

Address: PO 211 (Topeliuksenkatu 20), 00251 Helsinki

Telephone number: +358 50 407 6382

E-mail address: 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 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 41 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 will be carried out in Helsinki, Turku, Kuopio and Oulu urban areas and in rural areas close to cities. A total of 1,000 children will be recruited, half of which will come from urban areas and half from rural areas.

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. We also examine what factors are associated with children's movement behaviour and motor and cognitive skills (working memory and executive function). We focus in particular on differences between genders, socio-economic status of the family, rural / urban location, lifestyles and mental health symptoms of parents. In addition, we examine whether children's motor- and/or cognitive skills (working memory and inhibitory control), are connected with movement behaviour. In addition, we use address data and the GIS spatial information system to study whether the characteristics of the children's residential and daycare centre environments (including the natural environment and the built environment) are related to children's movement behaviour.

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, we will examine 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

Research assistants, research coordinators and researchers are responsible for the production, quality and archiving of the material. The study is conducted at the Folkhälsan Research Centre (Samfundet Folkhälsan i svenska Finland r.f.) in the research group of Professor Eva Roos. Eva Roos, responsible researcher, Elina Engberg, research project leader, and data collectors are responsible for the data collection phase of the study. Part of the research is being carried out in collaboration with the international SUNRISE research consortium, whose main responsibility is the University of Wollongong (Australia). A group led by Professor Anthony Okely will process the

pseudonymized data for analysis. The main analyses of the SUNRISE Finland study are conducted in Finland by Eva Roos' research group.

6. What information does the research data contain

Height, weight and waist circumference will be measured in children. Children's physical activity, sedentary and sleep will be measured by accelerometers, motor skills with five different tests, and cognitive skills with two games played on tablet computers. The data measured from children will be transferred to the University of Wollongong in Australia a pseudonymized form, which means that personal data cannot be directly linked to a specific person.

In addition, information is collected from the parents/guardians of children through two questionnaires, one in relation to an international project which is completed by only one of the parents, and the other in relation to the Finnish project, which is completed by the two guardians of the child (if two guardians participate in the study). Regarding the international project, the parent will be asked for information relating to the child's sleep, digital media use, dining, as well as their own sociodemographic factors and digital media use. This information will be sent to the University of Wollongong in Australia in a pseudonymized form. A survey related to the Finnish project collects information on the respondent's own and this child's home address and social security number. Information is also collected in relation to a child's sleep, use of digital media, time spent in nature and physical condition assessment. In addition, the survey collects information on parental socio-demographic factors, exercise, digital media use, sleep, and mental health and well-being. This data will not be sent to Australia but will be analysed at the Folkhälsan Research Centre.

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.

Consent to participate in the study is collected from the director of the daycare centre. In addition, one member of the daycare staff is interviewed for information about the course of the study, such as the daycare routines. The information is collected in an interview by a data collector.

7. Sources of personal data collected

Data will be 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 is also collected through measurements and tests performed at the daycare centre and with accelerometers. Later, the data of children and parents is also 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 provide 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.

10. Data recipients

The data collected in the study will be sent to the research team of Anthony Okely, the main responsibility organisation for SUNRISE research, at the University of Wollongong (Australia). This information includes a parental questionnaire from 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, as well as physical activity, sedentary and sleep data measured with two accelerometers.)

Information about the Finnish SUNRISE project is temporarily stored on a secure Webropol Oy server, from which data will be transferred to Folkhälsan's secure server with limited access.

The research material can be used, for example, in theses in the field of exercise, nutrition, psychology or behavioural sciences. The responsible researcher in charge grants the right to process the research material (pseudonymized) to other researchers / students. Material submitted for external use must be suitable for the same topic as the SUNRISE Finland Study.

11. Transfer of data outside the European Economic Area

During the transmission of collected data to Australia, the EU's General Data Protection Regulation (GDPR) regarding personal data will be taken into consideration. The collected data will be pseudonymized (each subject will create their own study ID) prior to transmission so that subjects cannot be identified from the data. We have also established a cooperation agreement with the University of Wollongong (Australia), covering intellectual property, data access, confidentiality, privacy and the roles and responsibilities of each party in the processing of personal data. The University of Wollongong in Australia is responsible for producing and transferring the material according to the International SUNRISE Protocol. The transfer of data is based on the EU Commission's standard contractual clauses (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en), which allow the recipient of personal data to comply with the data protection requirements of the clauses.

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:

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 processed during data collection (2022–2025) and will then be kept for further research invitations and further research for at least 25 years.

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