

## **Information on the processing of personal data in the SUNRISE Finland pilot study**

The SUNRISE Finland pilot study uses personal data as a material for the study. Purpose of this statement is to provide information on the personal data being processed and where the personal data originated and how it is used in research. It also describes the legal rights of the participants 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 sanction if you do not participate in the study or if you 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 in 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](mailto:eva.roos@folkhalsan.fi)

Responsible researcher: Eva Roos

### **3. Data protection officer**

Folkhälsan's data protection officer is Johan Huldén, general counsel. You can contact him via email address [dataskydd@folkhalsan.fi](mailto:dataskydd@folkhalsan.fi)

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

SUNRISE Finland pilot study is part of the International Study of 24-Hour Movement Behaviours in the Early Years: The SUNRISE Study, which currently includes 41 countries. The aim of the SUNRISE

study is to collect information of physical activity, sedentary behaviour and sleep, as well as motor and cognitive skills of children under school age. The results of the study will increase knowledge about children's health behaviour and the factors affecting to it. Such knowledge will help to improve children's health and well-being and promote 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. The aim of this pilot study is to test how the research protocol of the international SUNRISE study works in Finland. The pilot study will be carried out in Folkhälsan's Swedish-speaking daycare centers and language-oriented daycare centers with the aim of recruiting a total of 100 children, 50 from urban areas and 50 from rural areas.

The pilot study examines the proportion of 3-4 years old children who meet the World Health Organization (WHO) recommendations for physical activity, sedentary behaviour / screen time and sleep. We also study if these proportions differ by gender, socioeconomic status, or urban/rural location. In addition, we examine whether the physical fitness of children, as well as motor- and/or cognitive skills (working memory and inhibition) are connected with the fulfillment of the recommendations.

In addition to the international SUNRISE study, we collect additional information in the SUNRISE Finland study on another parent/caregiver questionnaire. The subject matters of the data to be collected are presented in more detail below. The collected data produce additional information on the lifestyle of Finnish children and parents/caregivers and are only available for analysis in Finland.

Height, weight and waist circumference will be measured from children. Children's physical activity and sleep will be measured by accelerometers, motor skills and physical fitness with six different tests and cognitive skills with two games played on tablet computers. The data measured from children will be transmitted to the University of Wollongong in Australia pseudonymized, in which case personal data cannot be directly linked to a specific person. In addition, information is collected from parents/caregivers of children through two questionnaires, one in relation to an international procedure which is completed by only one of the parents and the other in relation to the Finnish procedure, which is completed by two parents of the child (if two parents/caregivers participate). Regarding the international study, 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 format. Questionnaire related to the Finnish procedure asks about the child's sleep, digital media use, time spend in nature and physical fitness assessment and questions related to parents's own physical activity, sociodemographic factors, digital media use and sleep. This data will not be sent to Australia but will be analysed at the Folkhälsan Research Centre. Additionally, the experiences of the study will be collected from a group of parents/caregivers and daycare center staff through anonymous focus group interviews. Responses from the interviews will be sent to the University of Wollongong in Australia.

## **5. Executors of the study**

The study is conducted at the Folkhälsan Research Centre (Samfundet Folkhälsan i svenska Finland r.f.) in collaboration with the international SUNRISE Research Consortium. The responsible researcher Eva Roos, Marja Leppänen and Elina Engberg and the data collectors are responsible for the data collection phase of the pilot study. Research assistants, coordinators and researchers are responsible for the production, quality and archiving of the material. The collected data is

stored on the secur server of the University of Wollongong (Australia), the main responsibility organisation of the research consortium, where the team led by Professor Anthony Okely processes the datasets ready for analysis carried out in Finland in the Eva Roos group (Folkhälsan is also data controller of this material).

## **6. What information does the research data contain**

The study collects information on children aged 3 to 4 years, their caregivers, as well as interviewing daycare center staff. The personal data to be collected is pseudonymized by creating a dedicated ID for each participant.

Information collected from children: name, age, birthday, address, daycare center, gender, country of birth, height, weight, waist circumference, physical fitness, gross and fine motor skills, cognitive skills, upper and lower body muscle strength and information on physical activity, sedentary time and sleep measured using two accelerometers. Accelerometers collect information from a child for a total of five days. Measurements of physical characteristics are carried out by data collectors in the child`s daycare centre.

Additionally, information about the child is collected through questionnaires filled out by the paremts/caregivers. The parental questionnaire, which is part of the international SUNRISE protocol, is filled by only one of the caregivers. This form asks for information regarding the child's eating, sleep, screen time and physical activity/outdoor activities and sedentary behaviour. If two parents/caregivers participate in the study, both fill out the other questionnaire regarding the child's sleep, estimated physical fitness, circadian rhythm, screen time and time spent in nature.

From caregivers, information about themselves is collected in the form of questionnaires. Data to be collected on them include: name, age, date of birth, gender, country of birth, relationship with the child participating in the study, marital status, education, height, weight, information on physical activity, nature activities, screen time, socio-economic status and sleep.

Consent to participate in the study is collected from the manager of the daycare center. The daycare center staff will be subject to an anonymous Focus Group interview with a total of 4-8 people attending. The inquiry collects information regarding the course of the study, such as the experience of children in the study. In addition, a few questions are asked from one of the employee of the daycare centre. The questions are related to daily routines in daycare centre, such as daytime habits.

## **7. From what sources personal data is collected**

Data will be collected electronically with Webropol electronic questionnaire and REDCap electronic questionnaire (Webropol questionnaires: daycare centres director's consent to participate in the study, parent/caregiver consent to participate in the study, parental questionnaire for the SUNRISE Finland study, questionnaire of child`s physical fitness, diary on the use of accelerometers, and REDCap questionnaire: parental questionnaire for the International SUNRISE protocol). Data on children's height, weight and waist circumference, as well as tests related to motor skills and physical fitness will be reported to REDCap software. The Early Years Toolbox program collects information about children's cognitive skills. ActiGraph and Axivity

accelerometers collect information about children's physical activity and sleep. Accelerometers do not store information about the child's location.

## 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 pilot study will be sent to the research team lead by Professor Anthony Okely, the main responsible organisation for SUNRISE research, to the University of Wollongong (Australia). Information about the SUNRISE Finland study is temporarily stored on a secure Webropol Oy server, from which data will be transferred to Folkhälsan's secure server with limited access.

## **11. Transfer of data outside the European Economic Area**

In the possible transmission of the collected personal data to Australia, the main responsible country follows the applicable rules of the GDPR. The collected data will be pseudonymized (for each subject will be created 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 data transfer concerns 100 children and 200 caregivers.

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

No automatic decisions are made in the study.

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

Participant's privacy is secured by eliminating the identifiability of personal data and the tags are replaced by number codes (ID numbers). Daycare centers are also classified by number codes. Identification information are stored separately from other research data. Only a limited number of personell have access to identification informations.

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:

The data obtained from the consent forms is stored in electronic form on a secure server operated by Webropol Oy on a temporary basis, from which data is transferred to Folkhälsan's secure server with limited access. Webropol Oy guarantees data privacy. Webropol is committed to using some of the best technical practices in the industry to ensure that data is secured, and that it is not possible to use it unauthorized. Webropol is a SaaS (Software as a Service) provider and queries are created on the Webropol platform at: <https://new.webropolsurveys.com>. The service is located on the Webropol service provider server in Finland. Physical protection and backup storage of equipment is carried out by the service provider. (Microsoft PowerPoint - brochure-template.pptx (webropol.fi)).

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 analyzed with direct identifiers because (criterion for retention of direct identifiers):

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

Personal data will be processed during the implementation of the project (2023).

#### **15. Processing of personal data after the end of the research**

- Research data will be disposed
- The 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 new research use, the controller will ensure that the new use of research is compatible with the original use of the material in accordance with the requirements of the regulation. 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.

No notification of a new investigation can be sent to the data subject either 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: The data is stored in secure databases managed by Folkhälsan behind usernames and passwords for 10 years. The storage need is regularly assessed.

#### **16. What rights does the data subject have 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
- 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**

GDPR and the Finnish Data Protection Act allow derogation from certain data subject's rights 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 consider that 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