

Privacy Notice for Scientific Research

This privacy notice contains the information that must be shared with research subjects when you process any personal data in connection with scientific research. Personal data is information that could be used to identify a person directly or indirectly by e.g. linking one piece of data to another piece of data, which then allows the person to be identified.

This privacy notice demonstrates the data controller's accountability. Accountability is a key principle of the Data Protection Regulation and means that the data controller must be able to demonstrate that they are complying with data protection legislation. This privacy notice can also be used as a template when you are preparing the information that is to be provided to research subjects.

[GDPR 2016/679](#)

[Office of the Data Protection Ombudsman](#)

1 Name of the research

Working-life skills through simulations

2 Data controller

Minna Silvennoinen, Senior Researcher, School of professional teacher education
minna.silvennoinen@jamk.fi, +358505360330

3 Research parties and the division of responsibilities

Minna Silvennoinen (Senior Researcher, School of Professional Teacher education / Jamk), Heini Ikäheimo (Coordinator, University services), Eila Burns (Senior Researcher, School of professional teacher education / Jamk), Minna Haapakoski (Lecturer, School of Health/ Jamk), Katja Kokkinen (Lecturer, School of professional teacher education / Jamk), Susanna Kanninen (Planner, School of professional teacher education /Jamk), Siru Lehto (Head of Department, School of professional teacher education / Jamk).

4 Responsible leader of or group responsible for the research

Minna Silvennoinen, Senior Researcher, School of professional teacher education

5 Research implementers

Minna Silvennoinen (Senior Researcher, School of Professional Teacher education / Jamk), Heini Ikäheimo (Coordinator, University services), Eila Burns (Senior Researcher, School of professional teacher education / Jamk), Minna Haapakoski (Lecturer, School of Health/ Jamk), Katja Kokkinen (Lecturer, School of professional teacher education / Jamk), Susanna Kanninen (Planner, School of professional teacher education /Jamk), Siru Lehto (Head of Department, School of professional teacher education / Jamk).

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6 Contact information of the data protection officer

Jamk, Riikka Ahlgren, tietosuoja@jamk.fi, puh. +358 40 480 2094

7 Contact person for matters related to the processing of personal data

Minna Silvennoinen, Jamk, School of Professional teacher education, PL 207, 40101 Jyväskylä, minna.silvennoinen@jamk.fi, puh.+358 50 536 0330

8 Nature and duration of the research

☐ One-time research ☒ Follow-up research

Duration of the research (how long the personal data is to be processed):

1.1.2026-31.12.2032

How the personal data will be processed after the research has ended:

☒ Any research materials containing personal data will be destroyed

☐ Any research materials containing personal data will be archived

☐ without identifiers

☐ with identifiers

Where the materials will be archived and for how long:

9 For what purpose will the personal data be processed?

The purpose for the processing of the personal data is

☐ Applied research, development and innovation activities that serve promote industry, business and regional development and regenerate the industrial structure of the region.

☒ Scientific research

The focus is on developing teachers' and facilitators' competence in simulation pedagogy, as well as on creating inclusive and accessible learning experiences for students. The aim is to produce research-based practices that can be used across different fields to strengthen learning guidance and pedagogical planning. Personal data are processed from teachers, facilitators, and students who participate in training sessions, surveys, and interviews in order to assess the pedagogical effectiveness of simulations and participants' experiences. The study will generate knowledge to support the development of inclusive, digitally supported, and diversity-aware learning environments.

10 On what basis will the personal data be processed?

The processing of personal data always requires a legal basis. Read more about Legal bases for processing personal data: <https://tietosuoja.fi/en/when-is-the-processing-of-personal-data-permitted>

In this research, the processing basis is:

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☐ a task carried out in the public interest / the exercise of public authority belonging to the controller, more specifically:

☒ scientific or historical research or the compilation of statistics

☐ the archival of research materials and cultural heritage materials

☐ the implementation of the legitimate interests of the controller or a third party

specify the legitimate interest:

☐ consent of the data subject

☐ compliance with the controller's legal obligations

related acts:

The research includes the processing of special categories of personal data or personal data relating to criminal convictions and offences. The special basis required for the processing this type of data is:

☐ archival for the purposes of the public interest, scientific or historical research, statistical purposes

☐ explicit consent of the data subject

☐ a reason related to an important public interest on the basis of legislation

☐ on the grounds of public interest in the area of public health

11 What personal data is included in the research materials?

The research data include basic information about teachers/facilitators, students, and representatives of working life who participate in the study. The personal data collected are limited to information necessary for conducting the research and vary by participant group. Names, contact details, audio/video recordings, and combinations of background information may constitute personal data where they identify or could identify a participant.

Students

- Name, age, and field of study.
- Voluntary survey responses, which may include indirect personal data, such as descriptions of learning experiences or learning-related challenges.
- Audio and video recordings from learning and simulation situations.

Teachers and Facilitators

- Age, educational background, teaching field, or job role.
- Contact details for research-related communication.
- Materials related to the development of simulation pedagogy, such as simulation scenario plans, self-assessments, learning diaries, reflections, and feedback.

Representatives of Working Life

- Name, organisation, and field of activity.
- Contact details.

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- Background information, such as job role or duties.

12 What sources will be used to collect the personal data?

The following sources will be used to collect the personal data:

- ☐ Directly from research participants
 - ☒ Interview
 - ☒ Video recording
 - ☒ Digital questionnaire (Webropol or similar)
 - ☐ Questionnaire sent by mail
 - ☒ Other method, please specify:

During the study, data will include reflective diaries prepared by teachers and facilitators themselves, in which they describe and reflect on their competence development process, as well as pedagogical plans for simulations.

- ☐ From other sources than the participants in the research, where and what data:

- ☒ The research subject is not obligated to provide the necessary personal data, participation is voluntary

13 Transfer/disclosure of the data outside the research group

Research data will not be transferred or disclosed outside the research group. Materials containing personal data will be processed only by members of the project's research group. The research group may be expanded where necessary, for example to include researchers completing a thesis or doctoral dissertation. In such cases, those individuals will be formally appointed as members of the research group, and the necessary updates will be made to the research permits, consent forms, and data management plan. If an external service provider is used to transcribe or technically process the data—for example, a transcription service—the provider will act as a data processor under a separate data-processing and confidentiality agreement. Only limited, pseudonymised data that do not contain direct identifiers will be provided to the transcriber. Under the GDPR, pseudonymisation means that data cannot be linked to a specific person without additional information, which must be stored separately and protected through appropriate safeguards.

14 Data transfer/disclosure outside the EU or the EEA

All data transfers and processing will be carried out in compliance with the EU General Data Protection Regulation (GDPR). Personal data will not be transferred outside the European Union (EU) or the European Economic Area (EEA). The GDPR places specific conditions and safeguards on transfers of personal data outside the EEA; in this study, no such transfers will take place.

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15 Automated decision making

An automated decision means a decision that is used to evaluate the specific characteristics of person, is implemented with just automated data processing, and has legal implications for the data subject or will otherwise affect them in a significant manner. Some examples of automated decision-making include creditworthiness decisions and profiling. The data subject has the right to not be subjected to automated decision-making.

In scientific research, the processing of personal data is never used in any decisions concerning the participants of the research.

16 Personal data protection principles

A preliminary ethical review has been conducted on the research:

☒ Yes

Research ethics committee that provided the supporting statement:

Kirjalainen Elina, Senior Specialist, University Services

Hartikainen Tiina, Senior planner, Student services

Hautamäki Jari, Senior Lecturer, School of Technology

Laitinen-Väänänen Sirpa, Principal Researcher, School of professional teacher education

Norvapalo Kare, Head of RDI, School of Health

Törn-Laapio Anne, Senior Lecturer, School of Business

☐ No

More about Ethical review in human sciences: <https://www.tenk.fi/en/ethical-review-in-human-sciences>

The data that is to be processed in the information systems has been protected using the following:

☒ user ID ☒ password ☒ user registration ☐ access control (physical location)

☐ other methods, please specify:

Pseudonymisation and anonymisation:

When conducting scientific research, it is necessary to store the research materials used, so that the results of the research can be verified and that the research materials that have already been collected can be used in further research and new scientific research initiatives. The research materials will be anonymised or pseudonymised whenever possible. The research results will be published in such a way that no individual persons can be identified from the results. In special cases, such as when an artist is interviewed about their work, there may be reason to identify the person.

In this research:

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- ☐ The materials will be anonymised during the establishment phase of the materials (all identification data will be removed completely to ensure that the identification data cannot be reintroduced to the materials and that no new data can be linked to the materials)
- ☒ Direct identification data will be removed during the establishment phase of the materials (pseudonymised materials, meaning that a code or similar piece of information can be used to reintroduce the identification data back to the materials and that new data can be linked to the materials)
- ☐ The materials will be analysed using direct identification data, because (specify justification for retaining direct identification data):

No research data containing personal data will be entered into artificial intelligence tools. This applies both to direct identifiers and to information from which a research participant could be identified indirectly.

Safeguards to protect any sensitive data:

- ☒ Research plan
- ☒ Responsible leader of the research, please specify:

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- ☒ All personal data will be processed and disclosed only for research purposes and all the participants in the research agree to ensure that no data pertaining to a specific individual will be disclosed to any third parties
- ☐ A data protection impact assessment has been conducted on the research.
- More about impact assessment: <https://tietosuoja.fi/en/impact-assessments>

17 The rights of the data subject and any possible limitations to these rights

The data subject has following rights:

- Right to obtain information on the processing of personal data, unless an exception has been provided for by law
- Right of access
- Right to rectification
- Right to erasure (right to be forgotten). Not applied when legal basis of processing is legal obligation or public interest
- Right to withdraw the consent regarding processing of personal data
- Right to restriction of processing
- Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to object to the processing when legal basis of processing is public or legitimate interest
- Right to data portability when legal basis of processing is consent
- Right not to be subject to a decision based solely on automated processing
- The data subject can allow automated decision-making (including profiling) with his or her specific consent

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- Right to file a complaint to the Office of Data Protection Ombudsman if data subject considers that the current data protection legislation has been violated during the processing of his/her personal data

To exercise his or her rights, the data subject can contact the controller or the contact person or the data protection officer of the research. Further information related to the rights of data subjects can be requested from the contact person or from the data protection officer of the research mentioned in the beginning of this Privacy Notice.

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 subject for the sole purpose of complying with this Regulation. If the controller cannot identify the data subject the rights of access, rectification, erasure, notification obligation and data portability shall not apply except if the data subject provides additional information enabling his or her identification.

A derogation in the rights of data subject is necessary and justified if the research is meant for the purposes of the public interest and the rights of the research participant would be likely to prevent reaching these goals or hinder them greatly and these derogations are necessary to ensure these objectives.

☒ **There are no derogations from the rights of the data subjects in this research.**

This research is likely to derogate from the following rights specified in the EU General Data Protection-Regulation (justifications and protection measures for the derogation are located below):

- ☐ The data subject's right to check any data concerning them.
- ☐ The data subject's right to rectify any data concerning them.
- ☐ The data subject's right to restrict the processing of personal data.
- ☐ The data subject's right to object to the processing of personal data.

The following protection measures have been enacted in this research so that the derogation in the rights of the research participants can be made:

- ☐ The processing of personal data is based on the research plan.
- ☐ The research has a responsible leader or group.
- ☐ The personal data is used and disclosed only for the purposes of historical or scientific research or some other compatible purpose and all parties involved in the research agree to ensure that no data pertaining to any specific individuals is disclosed to any third parties.
- ☐ The research involves the processing of sensitive materials and an impact assessment on this has been made and submitted to the Office of the Data Protection Ombudsman 30 days before the processing is set to begin.

More about special categories of personal data: <https://tietosuoja.fi/en/processing-of-special-categories-of-personal-data>