



Information for Research Participants

This notice describes how your personal data will be processed in the study. Participation in the study is voluntary. There will be no negative consequences for you if you choose not to participate in the study or if you withdraw from the study. However, if you withdraw from the study, data collected prior to your withdrawal may still be used in the study.

AnalytiikkaÄly project is piloting student dashboard and simulation dashboard during April-December 2020. In these pilots we gather the answers collected personally from university students. In the student dashboard pilot, learning analytics is used to create visualizations on the dashboard using the student's personal study plan and credentials at the university. Information about the personal study plan and study performance information are not stored or used further in the research. In the simulation dashboard piloting we only collect students' responses to the questionnaires. Students can also be interviewed in connection with data collection.

The purpose of this report is to provide information about the personal data being processed, as well as where the personal data came from and how it will be used in the investigation. At the end of the report, it is explained in more detail what rights the data subjects have (section 16).

1. Data Controller

University of Oulu
Address: PL 8000 90014 Oulun yliopisto (Pentti Kaiteran katu 1, Linnanmaa)

2. Contact person and primary investigator

Primary investigator: AnalytiikkaÄly – project, prof. Hanni Muukkonen
E-mail: hanni.muukkonen@oulu.fi
Address: PL 8000, 90014 Oulun yliopisto
Tel.: 0504499447

3. Contact details of the Data Protection Officer

The data protection officer of the University of Oulu is Niilo Vähäsarja. He can be contacted at legal@oulu.fi.

4. Description of the study and the purposes of processing personal data

AnalytiikkaÄly is a joint project of seven universities, coordinated by the University of Oulu and funded by the Ministry of Education. The sub-objectives of the project are:

- Creating ways to provide the student with self-accumulating information, utilize it in study planning and learning to learn.
- Develop and test ways to use learning analytics in student guidance.
- Identify and pilot ways to use learning analytics provided information in university management decision-making, e.g. in the development of teaching and learning environments.
- Actively involve user groups to participate in the planning and evaluation of functionalities and ways of usage.
- Leverage information in different registers, taking into account application interfaces, data protection and ethics.

The AnalytiikkaÄly project is a key nationwide project that seeks best practices for utilizing a wide range of learning analytics data. The materials containing personal data describe how the study process of a university student can be assessed in the light of the personal study plan and study progress.

5. Parties and their responsibilities in research collaboration

The research data gathered in this project will be processed by researchers and research assistants from the University of Oulu, Aalto University, the University of Eastern Finland, the University of Lapland, the University of LUT, the University of Tampere and the University of Turku.

6. Personal data included in the research materials

The key research material consists of interview and audio recordings collected with separate consent, as well as answers to questionnaires presented to students.

7. Sources of personal data

The answers to the questions posed in the questionnaires, observation and interviews are obtained directly from the respondent.

8. Sensitive personal data

No sensitive personal data will be processed in the study.

9. Duration of the study

The consent form is collected with the name and research ID and the form is kept separate from the research data at the University of Oulu. Research data is used pseudonymized with the research ID and destroyed when it is no longer needed for research purposes.

10. Lawful basis of processing

Personal data is processed on the following basis, which is based on Article 6(1) of the General Data Protection Regulation:

- participant's consent
- performance of a task carried out in the public interest or in the exercise of official authority vested in the controller:
 - scientific or historical research purposes or statistical purposes
 - archiving of research materials or cultural heritage materials
- compliance with a legal obligation to which the controller is subject
- legitimate interests pursued by the controller or by a third party
 - description of the legitimate interest:

11. Recipients of the information

Personal data will be transferred to researchers at the University of Oulu's AnalytiikkaÄly project. The University of Oulu may also disclose the pseudonymized personal data to other project participants, which are: Aalto University, University of Eastern Finland, University of Lapland, LUT University, University of Tampere, University of Turku. The purpose of this disclosure is scientific research.

12. Transfer or disclosure of personal data to countries outside the EU/European Economic Area

Personal data will not be transferred outside the European Union.

13. Automated decisions

No automated decisions are made.

14. Safeguards to protect the personal data

Personal data will be stored and processed so, that only those who need it for research purposes can view the data.

Protection of manual material: any manual materials containing personal data will be stored under lock.

Personal data processed in IT systems:

- username
- password
- logging
- access control
- other: *(please specify)*

Processing of direct identifiers:

- Direct identifiers will be removed in the analysis phase
- The material to be analyzed includes direct identifiers. Reason: *(reason for retention of direct identifiers)*

Data protection in data transfer: Data is transferred in an encrypted connection service, which is accessible only to the parties to the research project.

15. Processing of personal data after the completion of the study

- The research material will be deleted
 The research material will be archived:
 without identifiers with identifiers

Research material will be stored until it is no longer needed for research purposes and possibly archived in Oulu University's archive.

16. Your rights as a data subject, and exceptions to these rights

The contact person in matters concerning the rights of the participant is the person mentioned in section 1 of this notice.

Withdrawing consent (GDPR Article 7)

You have the right to withdraw your consent, provided that the processing of the personal data is based on consent. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Right of access (GDPR Article 15)

You have the right to obtain information on whether or not personal data concerning you are being processed in the project, as well as the data being processed. You can also request a copy of the personal data undergoing processing.

Right to rectification (GDPR Article 16)

If there are inaccuracies or errors in your personal data undergoing processing, you have the right to request their rectification or supplementation.

Right to erasure (GDPR Article 17)

You have the right to request the erasure of your personal data on the following grounds:

- a) The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
- b) You withdraw the consent on which the processing was based, and there are no other legal grounds for the processing.
- c) You object to the processing (the right to object is described below), and there are no justified grounds for the processing.
- d) The personal data have been unlawfully processed, or
- e) The personal data must be erased to comply with a legal obligation in Union or Member State law to which the controller is subject.

The right to erasure does not apply if the erasure of data renders impossible or seriously impairs the achievement of the objectives of the processing in scientific research.

Right to restriction of processing (GDPR Article 18)

You have the right to restrict the processing of your personal data on the following grounds:

- a) You contest the accuracy of the personal data, whereupon the processing will be restricted for a period enabling the University to verify their accuracy.
- b) The processing is unlawful, and you oppose the erasure of the personal data, requesting the restriction of their use instead.
- c) The University no longer needs the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims.
- d) You have objected to processing (see details below) pending verification of whether the legitimate grounds of the controller override those of the data subject.

Right to data portability (GDPR Article 20)

You have the right to request to receive the personal data you have submitted to the University in a structured, commonly used and machine-readable format and have the right to transmit these data to another controller without hindrance from the University, provided that the processing is based on consent or a contract, and the processing is carried out by automated means.

When exercising your right to data portability, you have the right to have your personal data transmitted from one controller to another, where technically feasible.

Right to object (GDPR Article 21)

You have the right to object to processing your personal data, provided that the processing is based on the public interest or legitimate interests. The University will no longer have the right to process your personal data unless it can demonstrate compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject, or unless it is necessary for the establishment, exercise or defence of legal claims. The University can continue processing your personal data also when necessary for the performance of a task carried out for reasons of the public interest.

Derogating from rights

In certain individual cases, derogations from the rights described above in this section “Your rights as a data subject”, and exceptions to these rights may be made on the basis of the GDPR and the Finnish Data Protection Act, insofar as the rights render impossible or seriously impair the achievement of scientific or historical research purposes or statistical purposes. The need for derogations will always be assessed on a case-by-case basis.

Right to lodge a complaint

You have the right to lodge a complaint with the Data Protection Ombudsman’s Office if you think your personal data has been processed in violation of applicable data protection laws.

Contact details:

Data Protection Ombudsman’s Office (Tietosuojavaltuutetun toimisto)

Address: Ratapihantie 9, 6th floor, 00520 Helsinki

Postal address: B.O. Box 800, 00521 Helsinki

Tel. (switchboard): 029 56 66700

Fax: 029 56 66735

E-mail: tietosuoja(at)om.fi