



Information for Research Participants

AnalytiikkaÄly project is piloting learning analytics students' tool during academic year 2020-2021 in the University of Oulu. Research data collection is coordinated by University of Oulu, AnalytiikkaÄly project researchers. The collected data will be used for research and for the development of tools and usage practices at the University of Oulu.

This privacy 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.

The purpose of this privacy notice 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 research. At the end of the privacy notice, it is explained in more detail what rights the data subjects have (section 16).

1. Data Controller

University of Oulu
Address: PL 8000 90014 University of Oulu (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 University of Oulu
Tel.: 0504499447

3. Contact details of the Data Protection Officer

The data protection officer of the University of Oulu is Niilo Vähäsarja, dpo@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 path and study progress.

5. Parties and their responsibilities in research collaboration

Research data, which will also include personal data, will be gathered and stored in the University of Oulu and processed by the AnalytiikkaÄly project members responsible for research, and after the end of the project by Educational Psychology research group lead by prof. Hanni Muukkonen and their research collaborators.

6. Personal data included in the research materials

Data used in the tool: To give personal access to individualized learning analytics tool during the piloting the following information about students will be used:

- Right to study / Program where you study / Major
- Student identifying information
- Information about obtained study credits and grading at the University or Oulu
- Information about completed and uncompleted/ failed courses
- Personal study plan (PSP)

Visualizations and estimations in the tool are created based on this data but are not recorded or analyzed within the study. The data used in the tool is already available to the University of Oulu and no student input is required.

Data gathered as feedback: Research materials consists of students' answers to questionnaires and interview audio recordings. We collect students' responses and feedback using questionnaires and interviews three times during the academic year 2020-2021 to better

understand how the tool can support academic planning, monitoring and progression in studies. Questions in the questionnaire and interview include:

- Student ID
- Student's education related background
- Learning motivation and strategies
- Needs for support in university studies
- User experiences and suggestions
- E-mail address for sending link and instructions for second and third feedback gathering sessions and for contacting students willing to participate in the interview.

To better understand the use of the tool during the academic year and its connection to the academic success we ask students to provide their student ID in the questionnaires. This information will be used to:

- Count of number of times the student tool has been accessed
- Combine students' feedback from three data gathering sessions

Data about academic results: Additionally, we ask students to give separate consent to use their student ID to access and use their academic results data for the same research purposes. This data includes:

- Academic results in academic year 2020-2021
- Academic results used for enrolling to University of Oulu

Separate student's consent will be asked for interviews, questionnaires and use of academic results data.

7. Sources of personal data

Data utilized in the functioning of the tool comes directly from registry systems existing at the University of Oulu.

The answers to the questions posed in the questionnaires and interviews are obtained directly from the students.

The count of number of times the tool has been accessed comes from the internal services of reporting tools in the University of Oulu.

Academic results data is obtained from registry systems existing in the University of Oulu.

8. Sensitive personal data

No sensitive personal data will be processed in the study.

9. Duration of the study

The piloting learning analytics students' tool is carried out during academic year 2020-2021 at the University of Oulu. Students' ID obtained during the pilot will be removed and destroyed when students' answers to the questionnaires during several timepoints in the academic year will be combined. If the student gave consent to research their academic results using students ID, student's ID will be deleted from the dataset after this research is completed. Students contact information will be deleted after it is no longer needed to contact students. All other research material including personal data will be destroyed when it will no longer be needed for the 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

Research data, which will also include personal data, will be gathered and stored in the University of Oulu and processed by the AnalytiikkaÄly project members responsible for research, and after the end of the project by Educational Psychology research group lead by prof. Hanni Muukkonen and their research collaborators.

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 in the University of Oulu.

Personal data processed in IT systems will be protected by:

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: In the case of transfer, data will be 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

Where will the material be archived and for how long: materials can be stored in a suitable archive until it is no longer needed for research purposes.

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