



PRIVACY NOTICE CONCERNING SCIENTIFIC RESEARCH

You are participating in scientific research. This privacy notice tells you about the processing of your and your child's personal data as part of a study. You have a legal right to this information.

1. Data controllers in the study 'Sarjakuvat porttina lukemiseen' (Comics as a gateway to reading)

The data controller is responsible for ensuring that the processing of personal data in the study is legal.

The *joint data controllers* in this study are:

- University of Jyväskylä, Seminaarinkatu 15, PO Box 35, FI-40014 University of Jyväskylä. Business ID 0245894–7. Data Protection Officer of the University of Jyväskylä: tietosuoja@jyu.fi, +358 40 805 3297.
- Aalto University, Otakaari 1B, PO Box 11000, FI-00076 Aalto. Business ID 2228357–4. Data Protection Officer of Aalto University: tietosuojavastaava@aalto.fi, +358 9 47001.
- University of Turku, Turku Research Institute for Learning Analytics, 20014 University of Turku. Business ID 0245896-3. Data Protection Officer of the University of Turku: dpo@utu.fi, +358 29 450 3009.
- City of Helsinki, Education Division, Työpajankatu 8, PO Box 58300, 00099 City of Helsinki. Business ID 0201256–6. Data Protection Officer of the City of Helsinki: tietosuoja@hel.fi, +358 9 310 1691.

Principal investigator of the study and contact persons

Principal investigator of the study

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The members of the research team **processing personal data in the research** are under contract to the University of Jyväskylä, Aalto University, the University of Turku or the City of Helsinki. For more information, please contact the principal investigator of the study.

2. Processors of personal data

Processor means a party which processes personal data on behalf of the data controller and according to the instructions of the data controller. A data processing agreement is drawn up with the processor. For the purposes of this study, the processors of personal data are:

- Sanoma Media Finland (Aku Ankka) / Egmont Story House AB (Kalle Anka)
- REDCap Sweden AB (survey software)
- Statistics Finland

While the study is being carried out, the data controller may use processors who cannot be named in advance. The necessary agreements are always made with processors and their suitability for the secure processing of personal data is assessed before the agreement is made. Data subjects are informed separately about the use of a processor, if the change is significant from the data subject's point of view.

To ensure the correctness of the research data, the data controller may make the data available for processing (primarily without direct identifiers) to a so-called study monitor or verifier for a limited period of time, if necessary. They operate under the supervision of the research personnel. Data processing agreements are made with them, if they receive personal data.

3. Other disclosure of personal data during the study

In order to carry out the study, your personal data will be disclosed to Statistics Finland in accordance with the original purpose of use in order to add to the register data. The processing is based on public interest (section 4, subsection 3 of the Data Protection Act), as is the case for the project as a whole. Sufficient technical and organisational safeguards will be put in place: all data will be transferred over a secure connection, and in both organisations only a limited number of persons bound by an obligation to observe secrecy will have access to the data. If you wish, you can contact the principal investigator of the study to receive detailed information on where your data have been disclosed.

4. Personal data processed in the study 'Sarjakuvat porttina lukemiseen' (Comics as a gateway to reading)

Your personal data will be processed for the purposes of the research described in the bulletin. Data collection is based on the research plan.

The intervention in the research involves the delivery of Aku Ankka comics to the home for three months and their impact on children's interest in reading. To make this possible, Sanoma Media Finland / Egmont Story House AB will be given the names and addresses of the children whose guardian has consented to it. Sanoma Media Finland / Egmont Story House AB will only retain the address information for the duration of this delivery period

and will not use the information for marketing purposes. Sanoma Media Finland will not be given any other information about the participants in the study.

The personal data processed in the study are specified below. Direct identifiers (e.g. name, learner ID and edu.hel.fi credentials) are only used to combine the responses from pupils, guardians and teachers and are not included in the data to be analysed. For the analyses, the data are pseudonymised, i.e. the identifying data are converted into numerical identifiers that cannot be used to identify the respondents.

Pupils:

- Name
- School and grade
- Address information (for sending Aku Ankka comic magazines)
- Learner ID
- edu.hel.fi credentials
- Personal identification number
- Gender
- Language
- Finnish/Swedish language syllabus
- Learning support
- Number of absences

Guardians:

- Name
- Email address
- Phone number
- Relationship with the child (e.g. mother/father)
- Education

Teachers:

- Name
- School and grade
- Email address
- edu.hel.fi credentials
- Education
- Work experience

We also collect information about you that is relevant to the research from other sources:

Statistics Finland's register data

Pupils:

- Gender
- Mother tongue
- Place and date of birth
- Indicators describing the residential area

Guardians:

- Gender
- Mother tongue
- Place and date of birth
- The date of moving to Finland (if the person was born abroad)
- Indicators describing places of work and residence
- Income

- Profession
- Education
- Number of children in the family, their genders and dates of birth

Some of the pupils participating in the study will have participated in a trial for two-year pre-primary education and/or an intervention study on literacy skills during the academic year 2024-2025. If the guardian consents, these data can be combined with the data collected by Statistics Finland in this study. The combined data are only processed in the restricted remote access environment provided by Statistics Finland by researchers authorised to do so.

Special categories of personal data are not processed in the study.

This privacy notice has been published on the website of the study and a direct link to this information has been provided in the research bulletin to those participating in the study.

5. Legal basis for the processing of personal data in scientific research

The processing of your personal data is necessary for carrying out scientific research in the public interest on the basis of section 4, subsection 3 of the Data Protection Act.

6. Transfer of personal data outside the EU/EEA

Your personal data will not be transferred outside the EU or EEA in the study.

7. Protection of personal data

The processing of personal data in this study is based on an appropriate research plan, and there is a person responsible for the study. Only the personal data necessary for the purpose of the research will be processed as research data.

The personal data of the participants in the study will only be processed in an environment and with equipment that the data controller has assessed as being sufficiently secure for the processing of personal data. There are stricter data security requirements for special categories of personal data. A separate data management plan has been drawn up for handling the data.

As a safeguard, identifying information is removed from the data, i.e. direct identifiers such as the name, school and class are converted into a numeric identifier (pseudonymisation). This means that identifiability can be restored by means of a code or similar information. The code key is stored separately from the data, and it is accessible only to persons whose job description includes the processing of such data. At the end of the project, this code key will also be destroyed and the data will be anonymised, i.e. all personal data will be removed. The principle of minimisation of personal data and the requirement of necessity are taken into account during the life cycle of the data.

The data will be analysed in accordance with the project's research plan so that the responses of a specific individual are not reflected in the results. In addition, data on individual respondents, classes or locations are not reported separately, but results are reported by group, e.g. according to whether the respondent or group of children belongs to the test group or the control group.

8. Duration of the processing of personal data

The study produces different sets of data with variations in the way personal data are processed and the duration of the processing.

- 1) Sanoma Media Finland / Egmont Story House AB will process and store the address information of the participants in the research for the time necessary to deliver the comics. After that, the address information will be deleted, and by approximately September 2026, it will no longer be possible to restore it.
- 2) The University of Jyväskylä collects research consent forms from the families and teachers, and the personal data contained in these consent forms will be archived with identification data. Access to this material is restricted to designated researchers, whose job includes the processing of this material. The archived data related to research consent forms will be destroyed at the end of the study. The study will be considered concluded when two years have passed from the publication of the related research articles.
- 3) The assessment data combined, by Turku Research Institute for Learning Analytics (TRILA) will be anonymized (personal identifiers will be removed) after the data has been submitted to the University of Jyväskylä and the combined data has been reviewed. The anonymized data can be used for research related to the development of assessment tools. The data will be utilized by members of the TRILA consortium.
- 4) The research data that contains the pupil assessment data and the questionnaire responses from guardians and teachers (see more details in the Bulletin to Guardians) will be pseudonymised, i.e. personal data will be converted into numerical identifiers that cannot be used to identify individuals, classes or schools. Once the data has been reviewed, the data linking personal data and numerical identifiers will be destroyed, probably in 2027. The pseudonymised data are stored on a secure server at the University of Jyväskylä. These pseudonymised data are used by authorised researchers. After the study is completed, the data are carefully anonymised, i.e. all information that could be used to identify the participants in the research is removed. The anonymised data will be opened in a data archive deemed appropriate for this purpose. The opening of the material will be done in accordance with the legislation valid at the time as well as good scientific practice.
- 5) The data, where register data have been added to the data presented in the previous section 3, are stored on the servers of Statistics Finland. The actual research data will be pseudonymised as described in section 3. These data are used by authorised researchers in a remote access environment provided by Statistics Finland. The pseudonymised data can also be used in research carried out by the City of Helsinki, in which case the data will be processed by the researchers of the City Information Services of the City Executive Office. The information linking the numerical identifiers and the personal data is stored in a separate location, and it is only available to the Statistics Finland employees whose tasks include the processing of this type of data. Both the research data and the data linking personal data to numerical identifiers will be destroyed at the end of the study.

9. Rights of data subjects

Right of access (Article 15 of the GDPR)

You have the right to know whether your personal data are being processed and what personal data of yours are being processed. You can also request a copy of the personal data being processed, if you wish.

Right to rectification (Article 16 of the GDPR)

If there are inaccuracies or errors in your personal data that are being processed, you have the right to request that they be corrected or supplemented.

Right to erasure (Article 17 GDPR)

In certain cases, you have the right to request the erasure of your personal data. However, the right to erasure does not apply if erasure would prevent or seriously impair the achievement of the purpose of the processing in scientific research.

Right to restriction of processing (Article 18 GDPR)

You have the right to restrict the processing of your personal data in certain situations, such as if you deny the accuracy of your personal data.

Derogations from the rights

In certain individual cases, derogations from the rights described here may be made on the grounds set out in the General Data Protection Regulation and the Finnish Data Protection Act to the extent that the rights prevent or seriously impair the achievement of scientific or historical research purposes or statistical purposes. The need to make derogations from the rights is always assessed on a case-by-case basis. In addition, a derogation from the rights may be made if the data controller demonstrates that the data controller is unable to identify the data subject. If a data subject provides additional information in order to exercise their rights, and that information makes it possible to identify the data subject, the data subject's rights must be realised in principle.

Archiving

When personal data are processed for archiving purposes in the public interest, the data subject does not, as a general rule, have the rights described above or the right to object under Article 21 of the GDPR. The authenticity, reliability and research value of the archived data would be compromised if the personal data contained in the data were to be altered. The derogation is based on Article 32 of the Data Protection Act and Article 17(3) of the GDPR.

Automated decision-making

Your personal data will not be used for automated decision-making in the study.

Exercising the rights of the data subject

If you have any questions about your rights as a data subject, you can contact the Data Protection Officer. All requests concerning the exercise of rights should be sent to the Registry Office of the University of Jyväskylä. Registry Office and Archives, PO Box 35 (C), FI-40014 University of Jyväskylä, tel. +358 40 805 3472, email: kirjaamo(at)jyu.fi. Street address: Seminaarinkatu 15, C building (University main building, 1st floor), room C 140.

Reporting a data breach or suspected data breach to the University of Jyväskylä

<https://www.jyu.fi/en/data-privacy-at-the-university-of-jyvaskyla/report-a-data-security-breach>

The organisations listed in section 1 act as joint data controllers for the purposes of this study, i.e. they are jointly responsible for ensuring that the processing of personal data is legal. The participants in the study can make any requests related to the research to the University of Jyväskylä (the recipient) as described in the above paragraph. Data subjects can exercise their rights under the GDPR in relation to and against each data controller. In that case, the recipient will also forward the request or demand to the other joint data controllers.

You have the right to lodge a complaint with a supervisory authority, especially in the Member State in which your habitual residence, your place of work or the place of the alleged infringement is located, if you consider that the processing of your personal data infringes the EU General Data Protection Regulation (EU) 2016/679. In Finland, the supervisory authority is the Data Protection Ombudsman.

Up-to-date contact details for the Office of the Data Protection Ombudsman: <https://tietosuoja.fi/en/home>