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Privacy statement – Processing of personal data in TruSTme Webropol surveys

The Finnish Institute for Health and Welfare (THL) processes personal data for the performance of its statutory duties. THL complies with the applicable data protection legislation in processing personal data and ensures that data security is at an appropriate level. More information: <https://thl.fi/en/about-us/data-protection>

In this privacy statement we provide more details on how THL processes your personal data from two different Webropol surveys (1. Coverage and treatment process of wastewater treatment plants in Nordic countries and 2. Mapping current status of existing wastewater-based surveillance programs for communicable diseases in Nordic countries) in TruSTme ([Wastewater Treatment plants as a trusted Source of Timely information on antimicrobial resistance threat](#)) project.

1. Data controller

THL decides on and is responsible for the processing of personal data for the purpose described in this privacy statement, meaning that **THL is the data controller for this information.**

Our contact information is:

The Finnish Institute for Health and Welfare THL

P.O. Box 30

00271 Helsinki

puh. 029 524 6000

Contact person for matters regarding the processing of personal data:

Name: Kristiina Valkama

Address: Neulaniementie 4, 70210 Kuopio

Phone number: 029 524 7638

E-mail: kristiina.valkama@thl.fi

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THL's Data Protection Officer's e-mail address is tietosuoja@thl.fi.

2. Purpose of processing personal data

Wastewater Treatment Plants as a trusted Source of Timely information on antimicrobial resistance threat (TruSTme) project aims to explore Wastewater Treatment plants (WWTPs) as a trusted source of antimicrobial resistance (AMR) information to strengthen societal security and trust in Nordic countries. The project is carried out in cooperation with Lund University (Sweden), the Norwegian Research Centre, NORCE (Norway), and the University of Akureyri (Iceland). [More information about the project.](#)

In 1. Webropol survey, the aim is to gather information from Nordic countries about the coverage of centralized sewerage systems in different regions and existing wastewater treatment unit processes in these systems. In 2. Webropol survey, the aim is to map existing and planned wastewater surveillance (WWS) programs in Nordic countries. THL processes the results of the Webropol surveys and summarizes the results. The results obtained with the Webropol surveys are processed confidentially by THL.

The results of Webropol surveys will be discussed in workshops which will be arranged in the autumn of 2024. For purpose of inviting relevant stakeholders to the workshops, respondents' names and e-mails will be asked in the Webropol surveys and thus THL stores this contact information gathered in the surveys. The results of the Webropol surveys will be presented in the workshops and in publications of the TruSTme project. The results are presented and reported in such a way that the individual respondent cannot be identified.

3. Legal basis for the processing of personal data

The processing of personal data is always based on current legislation. THL's duties are defined in the Act on the National Institute for Health and Welfare (668/2008).

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The legal basis for the processing of personal data described in this privacy statement is:

Consent (General Data Protection Regulation, part 1 a of article 6).

4. Processed personal data

First Webropol survey will be sent to the relevant environmental authorities in Nordic countries. It is used to collect data of coverage of wastewater treatment plants, information about the treatment processes of wastewater treatment plants and information about the financing and challenges of wastewater treatment plants in Nordic countries. Second Webropol survey link will be sent to the relevant health authorities in Nordic countries, with aim to collect data about current status and future plans for use of wastewater-based surveillance for public health action.

In both Webropol surveys, respondent's name, job title, affiliation, email and region are asked in the mandatory fields of the survey. Responding to the survey is voluntary. In the surveys, we also ask, what country and entity respondent is representing and at what level respondent is answering (country, region, municipality). The respondent can also provide useful files (written documents, reports, and databases) describing the organization of the wastewater treatment and/or actions for wastewater-based surveillance in your country. Only public documents should be shared.

5. From what sources have personal data been collected?

Data is collected by Webropol survey directly from environmental and/or health authorities in all Nordic countries who are advised to answer to the survey by themselves. However, if the recipient does not know the national situation or there is no stakeholder that oversees the whole country or more detailed information is available regionally, we welcome responses from relevant stakeholders at the regions and municipalities. In such cases we advise the respondent to forward the survey to the autonomy regions/other regions and/or to relevant stakeholders in local level/municipalities.

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6. Disclosure of personal data

Personal data is not disclosed outside THL.

7. Transfer of data outside the EU or the European Economic Area or to international organizations

Personal data is not transferred outside the EU or the EEA or to international organizations.

8. Profiling and automated decision-making

THL does not make automated decision-making based on the profiling of persons, among other things.

9. Storage of personal data

The storage periods for personal data are determined in accordance with data protection legislation, the Archives Act (831/1994), the Act on Information Management in Public Administration (906/2019), and THL's information management plan.

Data containing personal data is archived without identifying information at the end of the project.

10. What rights do you have?

Data protection legislation grants you certain rights to ensure the protection of privacy, which is a fundamental right. **If you wish to use your rights, please follow these instructions:** <https://thl.fi/en/about-us/data-protection> or alternatively, contact THL's registry office (kirjaamo@thl.fi).

In certain cases, your rights may be restricted, for example, due to THL's statutory obligations or if the processing is for scientific research, statistics, or archiving purposes. If your rights are restricted, THL will implement appropriate and necessary safeguards as required by law.

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If THL is unable to identify you from the data, the rights to access, rectify, erase, and restrict processing do not apply.

10.1. Right to cancel consent

If we process your personal data based on your consent, you have the right to cancel that consent.

Please note that, in general, the processing of data unrelated to scientific research is based on legislation rather than your consent.

10.2. Right to access data concerning yourself

You have the right to know whether THL processes personal data related to you. Additionally, you have the right to know what personal data related to you is being processed and how it is being processed. You also have the right to receive a copy of your personal data, as long as providing the copy does not adversely affect the rights and freedoms of others or if THL does not have a legal basis to refuse the disclosure of the data.

10.3. Right to rectification

As a general rule, you have the right to rectification of inaccurate or incorrect data.

10.4. Right to data deletion

You may have the right to have your data deleted from THL's records. If the data processing is based on THL's statutory duties or there is another legal obligation to retain the data, your right to deletion is likely to be restricted.

10.5. Right to restriction of processing

You may have the right to restrict the processing of your personal data in cases prescribed by law. The right to restriction may apply, for example, if you believe that the personal data concerning you is inaccurate, is being processed unlawfully, or you have objected to the processing of your data. In this case, we may only process your

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personal data with your consent, for the establishment, exercise, or defense of legal claims, for reasons of public interest, or to protect the rights of another person.

10.6. Right to object to the processing of personal data

You may have the right to object to the processing of personal data in cases provided for by law. The right to object may apply, for example, if the data is used for direct marketing purposes.

10.7. The right to refer the matter to the supervisory authority

You have the right to have the lawfulness of the processing of personal data assessed by the Data Protection Officer.

Contact information:

Office of the Data Protection Officer

Visiting address: Lintulahdenkuja 4, 00530 Helsinki

Postal address: P.O. Box 800, 00531 Helsinki

Telephone exchange: 029 56 66700

E-mail: tietosuoja@om.fi