

DATA PROTECTION AND PRIVACY NOTICE

EU Horizon / EU-Funded Project SMARTER, Grant agreement number No. 101212794

1. INTRODUCTION

The protection of personal data is a high priority for Finnish Institute for Health and Welfare. All personal data are processed in compliance with the General Data Protection Regulation (EU) 2016/679 (GDPR), applicable national data protection laws, and the ethical requirements of EU Horizon-funded projects.

This privacy notice explains how and for which purposes personal data are processed in the context of the EU-funded project SMARTER (Grant Agreement No. 101212794), including stakeholder mapping, surveys, questionnaires, interviews, workshops, and related engagement activities.

Participation in all project-related surveys and activities is voluntary.

2. DATA CONTROLLER

Controller (Art. 4(7) GDPR):

Finnish Institute for Health and Welfare (THL)
PL 30, 00271 Helsinki, Finland
E-mail: kirjaamo@thl.fi
Phone: +358295246000

The **data protection officer** is Jarkko Reittu. If you have any questions about this privacy notice, please contact the data controller using the following contact information:

E-mail: tietosuoja@thl.fi
Phone: + 358 295 247 474.

In case of question or issues in context with contractual services your contact is: Jaana Halonen

E-mail: jaana.halonen@thl.fi

3. SCOPE OF THIS PRIVACY NOTICE

This notice applies exclusively to:

Personal data collected through project SMARTER

The website www.thl.fi/smarter where used for project activities, Survey and communication platforms used within the project (e.g. Webropol, Lyyti)

It does not apply to external websites linked from these platforms.

3.1 PARTICIPATION IN SURVEYS AND QUESTIONNAIRES

All information provided by you when participating in online surveys, questionnaires, interviews, or other engagement activities is processed confidentially and in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the ethical requirements of EU-funded project SMARTER.

Participation in surveys and questionnaires within the framework of project SMARTER is voluntary. Your responses will be used exclusively for scientific, research, and project implementation purposes related to project SMARTER. Survey responses are analysed in a

pseudonymised form, meaning that identifying information is stored separately from survey data and cannot be directly attributed to you without additional information.

Personal data are not disclosed to persons or organisations outside Finnish Institute for Health and Welfare and the SMARTER project consortium, unless such disclosure is required by law. Personal data shared with SMARTER project consortium include notes from online meetings / workshops (WP1 and WP3), project-level platform (WP1), aggregated results from surveys and interviews (all WPs), feedback from created tools (WP2), website and LinkedIn analytics (WP5), communication material (WP5) and other non-sensitive data specified in the project data management plan. All consortium partners receiving data are bound by Data Transfer Agreements and process personal data solely for project-related tasks in compliance with GDPR. Personal data are never sold, rented, or used for commercial purposes.

For reasons of readability, gender-specific language is not used. All terms apply equally to all genders.

If you choose to register on the controller's website or on a project-related platform, the personal data entered into the respective input form will be transmitted to the controller and processed solely for project-related and internal purposes. Personal data are deleted as soon as they are no longer required for the purpose for which they were collected.

Following the completion of a survey and the related analysis, personal data may be retained for up to five years for archiving, audit, and reporting purposes. Personal data are then deleted, unless statutory retention obligations require longer storage.

You may at any time:

- request access to your personal data,
- request rectification or erasure,
- request restriction of processing,
- withdraw your consent to data processing.

Requests can be addressed at any time to: Jaana Halonen (jaana.halonen@thl.fi)

Registration and Technical Data

During registration and participation in surveys or questionnaires, certain technical data may be processed, including:

- IP address
- Date and time of access or registration

This processing is necessary to ensure system security, prevent misuse, and guarantee the technical functionality of the platforms used. These data are not shared with third parties unless there is a legal obligation to do so.

Registered participants may request modification or deletion of their personal data at any time and may obtain information about the personal data stored about them.

3.2 WHAT DATA ARE COLLECTED?

Depending on the nature of your participation, the following categories of personal data may be collected:

a) Stakeholder and Contact Data

- Name
- E-mail address
- Telephone number
- Organisation and professional role

3.3 HOW DO WE COLLECT DATA?

Data are collected:

- Directly from you when you complete surveys, questionnaires, or registration forms.
- Automatically when you access the platforms used for project activities (e.g. THL's website, Microsoft Teams)

3.4 COOKIES AND PLATFORM FUNCTIONALITY

The platforms used for surveys and questionnaires (including Webropol for surveys and Lyyti for event registrations) use **strictly necessary cookies** to ensure their technical operation and security.

These cookies are required for:

- Providing access to surveys and questionnaires
- Preventing misuse
- Ensuring system stability

No profiling or marketing cookies are used by Finnish Institute for Health and Welfare in the context of project SMARTER.

Third-party platforms may use additional cookies over which Finnish Institute for Health and Welfare has no direct control. Further information can be found in their respective privacy policies:

- Lyyti: <https://www.lyyti.com/fi/turvallisuus>
- Webropol: <https://webropol.fi/tietosuojaseloste/>

You can configure your browser settings to refuse or restrict cookies. Please note that disabling necessary cookies may affect the functionality of surveys or registration processes.

4. CATEGORIES OF PERSONAL DATA PROCESSED

Depending on your participation, the following data may be processed:

a) Identification and Contact Data (stakeholder workshops)

- Name
- E-mail address
- Telephone number
- Organisation and role
- Area of expertise / profession

b) Socio-demographic Data (in resident surveys)

- Gender
- Age group
- Home language (Finnish, Swedish, or other)
- Employment status
- Residential area

c) Professional and Stakeholder Information (stakeholder workshops)

- Workplace
- Responsibilities
- Experience relevant to the project

d) Technical Data

- IP address
- Date and time of access
- Browser type and version
- Operating system
- Usage of data related to surveys and questionnaires

5. PURPOSES OF PROCESSING

Personal data are processed solely for scientific, research, and project implementation purposes, including:

- Stakeholder mapping and categorisation
- Communication with relevant stakeholder groups
- Invitations to surveys, interviews, workshops, and co-creation events
- Analysis of perceptions, attitudes, preferences, and willingness-to-pay related to project topics
- Dissemination and engagement activities as required under the Horizon Grant Agreement

Data processing is limited to what is necessary and proportionate (data minimisation, Art. 5(1)(c) GDPR).

6. LEGAL BASIS FOR PROCESSING (ART. 6 GDPR)

Personal data are processed on the following legal bases:

- Article 6(1)(a) GDPR – Consent, for participation in surveys, questionnaires, interviews, workshops, and stakeholder mapping
- Article 6(1)(b) GDPR – Performance of a contract, where processing is necessary for contractual or organisational participation
- Article 6(1)(e) Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- Article 6(1)(f) GDPR – Legitimate interests, limited to technical security, fraud prevention, and platform functionality

Consent may be withdrawn at any time without affecting the lawfulness of processing carried out before withdrawal.

7. DATA COLLECTION METHODS

Personal data are collected:

- Directly from data subjects via surveys, questionnaires, interviews, and registration forms
- Automatically via technical logs when accessing survey platforms
- Only strictly necessary cookies are used for the operation of the platforms. No profiling or commercial tracking is carried out.

8. DATA SHARING AND RECIPIENTS

Personal data are not sold, rented, or used for commercial purposes.

Within the framework of project SMARTER:

- Data may be shared with project consortium partners only where necessary for specific tasks and deliverables
- All consortium partners act either as joint controllers or data recipients under the Grant Agreement
- Data sharing is governed by Data Transfer Agreements and internal consortium rules

All recipients are located within the European Union or the European Economic Area (EEA), including Norway.

9. DATA PROCESSORS (ART. 28 GDPR)

The following service providers act as data processors on behalf of Finnish Institute for Health and Welfare:

- Service Provider Webropol (survey tool)
- Service Provider Lyyti (event management tool)

All processors are contractually bound by GDPR-compliant Data Processing Agreements.

10. PSEUDONYMISATION AND DATA SECURITY

Wherever possible, personal data are pseudonymised. Identifying information is stored separately from analytical data to prevent direct identification.

Appropriate technical and organisational measures (Art. 32 GDPR) are implemented to protect data against unauthorised access, loss, or alteration.

11. DATA RETENTION

Personal data are retained:

- For the duration of project SMARTER
- For a maximum of 12 months after project completion, unless legal obligations require longer storage
- Survey raw data used for evaluation may be archived for up to 5 years and then deleted

Data are deleted earlier upon withdrawal of consent or request for erasure, unless legal retention obligations apply.

12. RIGHTS OF DATA SUBJECTS

You have the following rights under GDPR:

- Access to your personal data (Art. 15)
- Rectification of inaccurate data (Art. 16)
- Erasure (“right to be forgotten”) (Art. 17)
- Restriction of processing (Art. 18)
- Data portability (Art. 20)
- Objection to processing (Art. 21)
- Withdrawal of consent at any time (Art. 7(3))

Requests can be addressed to: kirjaamo@thl.fi

13. COMPLAINTS

You have the right to lodge a complaint with a supervisory authority, in particular:

Tietosuojavaltuutetun toimisto
Street address: Lintulahdenkuja 4, 00530 Helsinki
Postal address: PL 800, 00531 Helsinki
Phone: 029 56 66700
Email: tietosuoja@om.fi

14. UPDATES TO THIS PRIVACY NOTICE

This privacy notice may be updated to reflect changes in legal requirements or project activities. Significant changes will be communicated appropriately.

Finnish Institute for Health and Welfare is committed to the highest standards of data protection, research ethics, and transparency in line with GDPR, Horizon Europe ethics requirements, and the EU Charter of Fundamental Rights.