



Information about personal data processing in the University of Helsinki research project “Imagi(ni)ng Democracy: European youth becoming citizens by visual participation”

The research project *Imagi(ni)ng Democracy: European youth becoming citizens by visual participation* involves the processing of personal data. The purpose of this notice is to provide information on the personal data that will be processed, the source of the data and how the data will be used in the study. For more information on the rights of data subjects and how you can affect the processing of your personal data, please see the end of this notice.

1. Data Controller

University of Helsinki
Address: P.O. Box 3 (Fabianinkatu 33), 00014 University of Helsinki, Finland

2. Contact person and principal investigator

Contact person in matters concerning the project:

Name: Lotta Ylä-Sulkava
Address: P.O. Box 3 (Fabianinkatu 33), 00014 University of Helsinki, Finland
Tel.:
E-mail: tietosuoja@helsinki.fi

Principal investigator:

Name: Professor Eeva Luhtakallio
Address: P.O. Box 3 (Fabianinkatu 33), 00014 University of Helsinki, Finland
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E-mail: eeva.luhtakallio@helsinki.fi

3. Contact details of the Data Protection Officer

The Data Protection Officer of the University is Lotta Ylä-Sulkava. You can reach her at tietosuoja@helsinki.fi.

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

ImagiDem explores, analyzes, and conceptualize visual participation of young European citizens in order to formulate a model of democratic practices in the 2020s. ImagiDem addresses visual political participation and democratic practices among young citizens in the European context combining visual ethnography with computational big data mining and analysis.

The data collected in ImagiDem consists of lists of hashtags and images and texts posted *publicly* on social media platforms (Instagram, Tumblr, Twitter). The project begins by mining social media and other relevant sources for images of participation. This is done through a pre-selected literature-based list of hashtags, and a snowball-type method of following the other hashtags that are used in those posts. The mining phase involves a large amount of image data. These data will be collected, stored and analysed in accordance with the EU's General Data Protection Regulation and Finnish national legislation. The lawful basis for data processing in the project is research task carried out in the public interest as identified in Art. 6.1(e) and (where applicable) Art. 9.2(e) of the GDPR, as further stipulated in § 4 and § 6 of the Finnish Data Protection Act (1050/2018).

The EU's General Data Protection Regulation (2016/679, GDPR) law will be followed in every phase of the study.

5. Who is carrying out the research?

The personal data are processed by researchers at the Faculty of Social Sciences at the University of Helsinki.

6. Personal data included in the research data

No data will be collected or stored that would enable connecting individual images with other personal information. Only hashtags with sufficient degree of generality are used in the mapping. The data may, however, potentially include images of individuals. In keeping with the Art. 5:1 of the GDPR 2016/679, the project commits to the principle of collecting minimal data and storing it only for a time period that is necessary for the analysis.

7. Sources of personal data

The images processed are collected from social media platforms, namely Instagram and Twitter.

8. Sensitive personal data

No data considered as special category data under Article 9 of the General Data Protection Regulation will be processed in the study.

OR

The following data considered as special category data under Article 9 of the General Data Protection Regulation (sensitive personal data) will be processed in the study:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data for the purpose of uniquely identifying a natural person
- Health
- A natural person's sex life or sexual orientation

The processing of special category data is based on Article 9(2)(j) of the General Data Protection Regulation (processing is necessary for scientific purposes) and section 6, subsection 1, paragraph 7 of the Finnish Data Protection Act (Article 9(1) of the General Data Protection Regulation does not apply to processing of personal data for the purposes of scientific research).

Persona data relating to criminal convictions and offences or related security measures will be processed in the study.

The processing of data related to criminal convictions and offences is based on section 7, subsection 1, paragraph 2 of the Finnish Data Protection Act (the processing of data related to criminal convictions and offences as described in Article 10 of the General Data Protection Regulation is permitted for scientific research purposes).

9. Duration of processing

The data will only be process during the project period 2019–2024.

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:

- 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

- participant's consent
 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:

If processing is based on the consent of the participant, the participant has the right to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

11. Recipients of the personal data

No personal data will be transferred outside the research group.

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

No personal data will be transferred to recipients outside the European Economic Area.

13. Automated decisions

No automated decisions with significant effects on the participants are made in the study.

14. Safeguards to protect the personal data

The personal data is processed and stored in such a way that only persons who need the data for research purposes can access them.

Personal data processed in IT systems:

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

How data in physical format (e.g. paper) is protected:

Processing of direct identifiers:

- The data is collected without direct identifiers
 Direct identifiers will be removed in the analysis phase
 The material to be analyzed includes direct identifiers. Reason:

15. Retention 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:

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.

Rights of data subjects

According to the General Data Protection Regulation (GDPR), data subjects have the right

- of access to their data
- to rectification of their data
- to the erasure of their data and to be forgotten
- to restrict the processing of their data
- to data portability
- to object to the processing of their data
- not to be subject to a decision based solely on automated processing.

Not all of these rights can be exercised in all situations, depending on factors such as the basis for the processing of personal data.

For more information on the rights of data subjects in different situations, please see the Data Protection Ombudsman's website: <https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations>

Exceptions to data subject rights

Under the General Data Protection Regulation and the Finnish Data Protection Act, certain exceptions to the rights of data subjects can be made when personal data is processed in scientific research and fulfilling the rights would render impossible or seriously impair the achievement of the objectives of the processing (in this case, scientific research).

Prior to data acquisition, the research team has carried out a risk assessment and a Data Protection Impact Assessment.

The necessity of exceptions to the rights of data subjects 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 (Tietosuojavaikuttetun 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

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