

PRIVACY NOTICE

According to the EU General Data Protection Regulation GDPR (EU 679/2016), Art. 13-14

The notice concerns: The Cultural Sciences Archive Cultura's processing of informants' personal data

Data controller

Åbo Akademi University
Tuomiokirkontori 3
20500 Turku
Finland

Åbo Akademi University is controller for the personal data collected and processed in the university's activities – in teaching, guidance, research, administration, and cooperation, internally and externally.

Responsible unit for the processing that is described in this document:
The Faculty of Human and Social Sciences; Department of Humanities

Contact person:

Contact person: Fredrik Nilsson, cultura@abo.fi, +3585053033884

Data Protection Officer at Åbo Akademi University: dataskydd@abo.fi, +358 2 215 31 (switchboard).

For what purpose do you use the personal data?

Overall purpose:

- Description of system or tool

The fundamental purpose of the archive is to preserve and make available archival materials for scientific and historical research. In order to preserve the collections and fulfil its archival function in the public interest, the archive collects and preserves information about the informants whose information is archived in the form of i.e. questionnaire answers or interviews.

What is the legal basis for processing personal data?

Public interest or official authority (Art. 6 1 e)

Åbo Akademi University has statutory tasks of public interest and the right to exercise official authority

according to the Universities Act. Scientific and historical research is an example of a statutory task of public interest.

Cultura archives, preserves and makes available to researchers and the general public materials for scientific and historical research. In order to preserve the provenance of its materials, and to satisfy rights such as copyright or ownership the archive collects and archives information about the persons and organizations that donate or participate in the creation of research materials that are archived.

The legal basis for collecting and processing research materials containing special categories of personal data is consent (GDPR Art. 9a). When the research project and the original processing is finished, the legal basis for further processing and archiving is GDPR Art. 9j.

The purpose of the cultural-historical collections of the archive is to document and preserve for future research society and culture in all its complexity and diversity, which invariably also means archiving special categories of personal data (the constitutional right to have one's own history and cultural heritage preserved for future generations – sections §16 and §17 of the Finnish constitution (731/1999)). In relevant cases §12 of the Finnish constitution regarding freedom of speech also applies.

Which personal data is processed and by whom?

Personal information: name, address, phone number, e-mail address, fax number; personal identity codes may historically have been entered into collections but these are never actively collected.

Demographic (contextual) information: gender, date or year of birth, marital status, nationality/ethnicity or native language, education, profession, health information, family ties.

The collections in and of themselves: written records by or about persons (questionnaire answers, personal letters); photographs, audio and video recordings

Metadata for all the above, created by the archival personnel.

The data is processed by the archival personnel, as needed by other ÅAU personnel (Data Protection Officer, IT, researchers), when justified by the archive's customers for research purposes, as necessary by data processors contracted by ÅAU (Webropol, Collection Pro, parties hired as needed by IT).

User rights are defined and updated based on task-related usage needs.

From where do you collect personal data and how is the data processed?

When Cultura is collecting materials (i.e. through questionnaires, fieldwork), the personal data is collected from the individuals themselves. Cultura also carries out collections in collaboration with researchers and/or other archival institutions.

Physical archival records and materials are stored in locked spaces. Digital materials are stored and processed within ÅAU's internal IT infrastructure, in accordance with organization policies and procedures regarding information security.

Informants' personal data is collected by Cultura when carrying out questionnaires through physical paper copies and digitally through Webropol. The information is then transformed into and processed as metadata in CollectionPro.

How do you delete or archive the personal data?

The personal data is an essential part of the documentation of the archival holdings' provenance, and is archived permanently.

Is personal data transferred for processing outside Åbo Akademi University?

Yes, personal data will be transferred for processing outside Åbo Akademi University.

The Webropol tool is used for online questionnaires.

Informants' personal data is also preserved as metadata in the collection management database Collection Pro.

Is the personal data transferred outside Åbo Akademi University for the needs of a third party?

Yes, personal data will be transferred outside Åbo Akademi University.

The default position is that informants' identifying personal data will not be transferred to customers of the archive. Researcher enquiries pertaining to the informants' personal data are always processed in accordance with the ÅAU archives' internal guidelines for customer service, in order to comply with the principle of minimizing personal data and prevent misuse of the data. Data from the informant register is made available for research purposes only when the researcher has submitted a written justification of why the data is necessary for the research task, and after separate review by the archive staff.

Is personal data transferred outside EU/EEA?

Personal data is transferred outside EU/EEA due to a specific purpose.

Cultura's archiving of research materials may include materials collected outside of the EU/EEA, and the informants in question, along with their close families, have a right to information about their personal data stored in the archive.

Customer inquiries may be sent to the archive from areas outside the EU/EEA.

Additional information about a long-term or persistent register, system, or tool:

Principles for how the data/register is protected:

The archive ensures the safety of the physical materials by following internal guidelines and procedures set by ÅAU. The integrity of the physical materials and personal data contained therein is ensured through standard archive management practices.

Digital materials are preserved within the ÅAU IT environment and only processed and stored by third parties (contracted by ÅAU) possessing sufficient industry knowledge.

Compared to the archival collections proper, even stricter protective measures are taken for the data contained in the archive's donor and informant registers.

List of regular data sources (national registers, etc.): -

Principles and regulations for storage and storage time:

The Cultura archive preserves culturally and historically significant archival materials and research materials from the field of humanities, in general indefinitely. Personal data contained in the collections is archived and processed to the extent necessary for carrying out Cultura's archival function in the public interest, in accordance with current law. The owner of the collections, Åbo Akademi, is a university as defined by Finnish university law, and maintaining the Cultura archive is a task of public interest.

Detailed information on automated decision-making:

The archival processing and preservation do not entail any automated decision-making.

What rights do you have when Åbo Akademi University processes your personal data?

Åbo Akademi University is responsible for taking appropriate technical and organizational measures to protect personal data against unauthorized or illegal processing and against damage to or loss of personal data. Personal data must always be processed in a fair and transparent manner in accordance with applicable data protection regulations

According to the EU General Data Protection Regulation GDPR, you have the right to

- get transparent information on how your personal data is processed and how you can exercise your rights (Art. 12)

- get access to your personal data at Åbo Akademi University and information on the processing of data (Art. 15)
- have your personal data corrected (Art. 16). *Note that employees and students at Åbo Akademi University can in most cases correct their own data according to the instructions on the intranet.*
- have your data erased ("the right to be forgotten") in certain situations (Art. 17)
- restrict the processing of your personal data in certain situations (Art. 18)
- have your personal data transferred between systems in certain situations (Art. 20)
- object to the processing of your personal data in certain situations (Art. 21)
- not be subject to automated decision-making, with certain exceptions (Art. 22)

You have also the right to be informed of a personal data breach involving a high risk for your personal data (Art. 34).

When the purpose of the processing is scientific research, statistics or archival purposes, the rights may be restricted by the Data Protection Act (1050/2018). Restrictions on rights always require special protective measures.

If you have questions about your rights, you can contact the responsible contact person (see above) or the ÅAU Data Protection Officer (dataskydd@abo.fi). See also the overall information on the processing of personal data on the ÅAU website (www.abo.fi/en/processing-of-personal-data-at-abo-akademi-university).

You have the right to lodge a complaint with the data protection authority if you believe that the processing of your personal data is an infringement of the General Data Protection Regulation (GDPR).

Contact information to the data protection authority:

Office of the Data Protection Ombudsman
PL 800
00531 Helsinki
+358 29 566 6700 (switchboard)
tietosuoja@om.fi
tietosuoja.fi