## Privacy notice for thesis [Fill in name of the thesis]

[This template is meant to help students and thesis advisors compose a private notice in situations where students not employed by Aalto University independently collect and process personal data for thesis purposes. In such cases, the student and not Aalto University is the controller of the personal data. Please note that in case a student wishes to use the same data in postgraduate studies, such as doctoral thesis or scientific publications, this must be noted in this privacy notice. For example, the section regarding purpose (section 1), sharing the data (section 5, in case Aalto employees or researcher need access to the data for this further use), and deletion of the data (section 8, the data will be stored for a longer period of time if there is a further use purpose after the master’s thesis) this needs to be noted clearly for the participant. Please note that as consent is used as legal basis for processing personal data in this template, the data subjects may any time withdraw their consent and require that their data is deleted. Furthermore, the student stays as controller of the data the entire time. In case the further research purpose has not been noted in the privacy notice when the data has been collected and it turns out to be usable for further research purpose on later date, it is possible to ask for additional consent for this use, if the contact details of the participants are still available.]

The privacy notice must be given to the study participants before their personal data is collected.]

### What is the purpose of processing the personal data?

The purpose of processing the personal data is to collect material for a master’s thesis on the topic [Please tell very briefly what the thesis research aims to find out and how the research will be carried out]. The thesis research material will be collected from [Add a brief description of the interviews or questionnaires, etc., used to collect the material.]

### What personal data will be processed in the thesis work?

[This section must list the types of personal data processed in the thesis research. Try to describe this as concretely as possible. Personal data is all the information connected to a natural person, not just the direct identifiers like the name and contact information.

In most cases, all the research data you collect from the research participant is personal data, for example, interview responses, questionnaire responses, photographs, and video or audio recordings of the participant. Review mentally the course of the research and its implementation stages, then list here the personal data that will be collected and recorded and the form in which it will be recorded (e.g. text, video, or audio recording). You may, for example, think about how the research will proceed and the personal data be collected in the following manner: 1. You may plan to collect the research participant’s name and contact details for practical matters like agreeing on and scheduling the research session(s) with the participant. 2. Next, before you start collecting the research data, you ask the research participant to sign the consent form for participation. The form includes the participant’s name. 3. Finally, you carry out the collection of the research data in the research session (interview, workshop, etc.) with the participant. Examples of personal data are:

* Direct identifiers such as name and contact information
* Consent forms (includes at least the name of the participant)
* All the information pertaining to the participant which the participant about themself in the questionnaire
* Audio and video recordings, and possible a transcribed version, i.e. the audio recording converted into text form.
* Interview responses]

**Special categories of personal data (sensitive personal data)**

[Choose option 1 or 2. **You should avoid** **processing sensitive personal data in bachelor’s and master’s theses, particularly if you are processing personal data for research for the first time, as you may lack the tools to protect sensitive data appropriately.**

If no sensitive data i.e. special categories of personal data being are processed in the thesis research, choose the first option, ‘Data belonging to special categories or other specially protected personal data will not be processed in the thesis research’, then delete the other option and the list of special categories.

Please note: Special care must be taken to protect special categories of personal data. Its processing must be planned thoroughly. See the instructions [[Research Ethics Committee | Aalto University](https://www.aalto.fi/en/services/research-ethics-committee)] on processing special categories of personal data. Choose from the list below.]

[Option 1 Data belonging to special categories of personal data or other specially protected personal data **will not be processed** in the research study.

[Option 2] In addition, the following special categories of personal data will be processed:

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

Data concerning health

Data concerning a natural person’s sex life or sexual orientation

Data relating to criminal convictions and offences

Personal identity code – processing is necessary for identification or combining thesis research materials.

**Personal data is collected from the following sources:**

From the participant: [e.g., interviews, questionnaires]

From a data register: [e.g., The Finnish Population Information System]

### Processing of personal identifiers in the analysis stage and thesis

Direct identifiers, such as your name, is processed in the collection and analysis of the materials.

The direct identifiers will be removed or replaced with random identifiers in the published thesis.

[Following along those lines, include a more specific description of what direct identifiers will be removed or replaced with random ones, how you will remove data not necessary for the research. See the examples below and choose the ones applicable to your research.

* Direct identifiers appearing in the interview are removed when the interview is transcribed. The original sound recording is deleted immediately once the transcription is completed.
* Data from the interview material that may make it possible to deduce the identity of an interviewee (e.g. the individual’s employer and job position) is deleted during the transcription phase.
* Sensitive data that is revealed by the research participant and does not need to be processed in the research is deleted during the transcription phase.
* Data is presented in aggregate form, for example, an age range is used instead of the exact age to make identification more difficult. ]

Your identity will be impossible to determine in the published thesis. [Please edit this text if you are conducting interviews, for example, where the purpose is to publish the participant’s name or job position and employer or if the publication contains photographs of the participants.]

### Legal basis for processing personal data

The legal basis for processing personal data is the express consent of the research participant to data collection and analysis.

[When the legal basis is consent, the research participant has the right to withdraw their consent. If the person withdraws their consent, their personal data must be erased. It is recommended that there be no such personal data visible in the final thesis that allows the identification of the persons involved, unless otherwise agreed. If you regard consent as not being a possible legal basis for processing personal data in the case of your thesis research (in case of register research, for instance), you should discuss the matter with your thesis advisor. For more information, see the instructions at Aalto.fi (link to be added) ]

# Withdrawal of consent will have no effect on an approved thesis, because an approved thesis is an academic publication, where the processing of personal data serves the purpose of academic expression (Articles 6 and 85 of the General Data Protection Regulation (EU) 2016/679 and section 27 of the Data Protection Act of Finland (1050/2018)). No data may be erased from an approved thesis.

### Sharing personal data

Material containing your personal data may be shared with the thesis advisor xx if necessary for the advising process.

### International data transfers

Any transfers of research data containing personal data outside the EU/EEA countries or to international organisations comply with the provisions of current the data protection legislation.

### Storage and protection of personal data

During this research, the privacy of the research participant is protected as follows:

The thesis research follows a research plan.

The thesis research has a thesis supervisor / thesis advisor [name and contact details]

**Protection of manual material:** [Describe here where and how material in paper or in other physical form is stored, for example, you may describe here that consent forms are stored in a locked cabinet.]

**Information processed in information systems:** The computers and information systems used are protected with a username and password. Access to research data containing personal data has been restricted so that only the student and the thesis advisor have access to your personal data.

### Retention and deletion of personal data

**Deletion during and after the research**

[Describe here when research data containing personal data will be destroyed. It is recommended that research data containing personal data be destroyed no later than 6 months after the thesis approval.]

[In case you are planning to use the collected data for postgraduate studies, such as doctoral thesis or scientific publications, decide the appropriate deletion time. It is also possible to bound the deletion time to the completion of the doctoral thesis or scientific publication, meaning that the data will be deleted, for example, X years since the latest publication where the data is used.]

### Rights of the research participant

According to the General Data Protection Regulation (GDPR), you have the right to:

* be informed of the processing of your personal data
* access the personal data collected concerning yourself
* request the rectification of your personal data
* request that the processing of your personal data be restricted
* object to the processing of your personal data
* request the erasure of your personal data. It should be noted, however, that an approved thesis is an academic publication, where the processing of personal data serves the purpose of academic expression (Articles 6 and 85 of the General Data Protection Regulation (EU) 2016/679 and section 27 of the Data Protection Act of Finland (1050/2018)). No data may be erased from an approved thesis.
* If the research does not require or no longer requires the identification of a data subject by the controller, the controller shall not be obliged to maintain, acquire or process additional information in order to identify the data subject for the sole purpose of the data subject using his or her rights. If the controller does not recognise the data that may be linked to a specific data subject, the data subject has no right to access or rectify their personal data, to object to their processing or to request the erasure of data. However, if the data subject provides additional information that allows their identification from the research data, the rights will not be restricted.

### Contact details of the controller

The controller of this research is student [Student name and contact details].

### Contact details of the Aalto University data protection officer and those of the supervisory authority

If the research participant has any questions regarding data protection or personal data processing, they can contact the Aalto University data protection officer, tel. (09) 47001 (exchange), [dpo@aalto.fi](mailto:dpo@aalto.fi)

If the research participant considers the processing of their personal data to be an infringement of privacy protection legislation, they have the right to lodge a complaint with the Data Protection Ombudsman, which is the supervisory authority. (Read more at <https://tietosuoja.fi/en/home>.)

**Consent to participate in thesis research and to the processing of personal data**

I understand that participating in the thesis research is voluntary and that I can notify the student at any time that I no longer wish to take part in the research. In such cases, any data collected up until that point can be used in the thesis research. I consent to the use of my personal data in the manner described in the privacy notice for the thesis.

I have received sufficient information about the thesis research, I have had the possibility to have my questions answered, I have understood the information given to me and I wish to participate in the thesis research.

I understand that an approved thesis will be published, and that changing or erasing anything from it after its publication will not be possible, because a thesis is a permanent academic publication protected by the freedom of academic expression.

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Date and signature of research participant. Consent can also be given via email or by filling in a questionnaire.