

EU General Data Protection Regulation (EU
2016/679), art. 12, 13, 14

1. Title, nature, and duration of research

Title of research: Survey on Pressure, Harassment, and Intimidation Against Journalists 2024

☒ Case study

Duration of research: September 2024–October 2024

Duration of data processing: The collected data will be stored in Tampere University for 3 years, after which an assessment regarding the usefulness of the data will be made. If this assessment finds that the data is no longer needed for research purposes, it will be erased. This assessment will be repeated every 3 years after until the data is erased

2. Data controller (pick one)

☒ Research will be conducted in an employment contract with the Tampere University, indicating the University to be the data controller.

Tampere University Foundation sr
33014 Tampere University
Kalevantie 4, 33100 Tampere
Business ID: 2844561-8

3. Contact person regarding the research registry

Name *Ilmari Hiltunen*
Address *Tampereen yliopisto, Pääatalo E 319a, Kalevantie 4, 33100 Tampere*
Phone number *+358 50 509 9034*
E-mail address *ilmari.hiltunen@tuni.fi*

4. Contact information of the Data Protection Officer (not applicable to student-conducted research)

Data protection officer in Tampere University
dpo@tuni.fi

5. Principal investigator or research group

Name *Kaarina Nikunen*
Address *Tampereen yliopisto, Pääatalo E 307, Kalevantie 4, 33100 Tampere*
Phone number *+358 40 190 4094*
E-mail address *kaarina.nikunen@tuni.fi*

EU General Data Protection Regulation (EU
2016/679), art. 12, 13, 14

6. Researchers

Ilmari Hiltunen
Postdoctoral Research Fellow
Faculty of Information Technology and Communication Sciences
Tampere University

Aleksi Suuronen
Doctoral Researcher
Faculty of Social Sciences, Business, Economics, and Law
Åbo Akademi University

Reeta Pöyhtäri
Senior Research Fellow
Faculty of Information Technology and Communication Sciences
Tampere University

7. Content of research records

The research records will contain the following types of personal data:

Gender
Age
First language
Ethnic origin
Sexual orientation
Religious beliefs
Other possible minority position
Occupational history
Information related to occupational position and employer

8. Sources of personal data

Personal data is collected directly from the informants using an online survey form.

9. Purpose of processing personal data

The purpose of processing personal data is scientific research. The data will be used to explore the occurrence of occupational pressure, harassment, intimidation, and violence among Finnish professional journalists and to examine how these phenomena affect their professional conduct and personal wellbeing. The collection of sensitive personal data belonging to special categories is justified, as the research seeks to uncover possible connections between various minority positions and the incidence of pressure, harassment, intimidation, and violence.

10. Lawful basis for processing personal data

The lawful basis for processing under the EU's General Data Protection Regulation, Article 6 Paragraph 1, and the Personal Data Act, Section 4:

EU General Data Protection Regulation (EU
2016/679), art. 12, 13, 14

- ☒ Public interest or the exercise of official authority
 - ☒ Scientific or historical research purposes or statistical purposes

11. Sensitive personal data (special categories of data and criminal records)

- ☒ The following types of sensitive personal data will be processed during the research project:
 - ☒ Racial or ethnic origin
 - ☒ Religious or political beliefs
 - ☒ Data concerning a natural person's sex life or sexual orientation

Will personal data concerning criminal convictions and offences be processed during the research project?

- ☒ No

12. Lawful basis for processing of sensitive personal data:

The lawful basis for processing under the EU's General Data Protection Regulation, Articles 9 (special categories of personal data) and 10 (personal data relating to criminal convictions and offences), and the Personal Data Act, Sections 6 and 7:

- ☒ The processing activities are conducted for the purpose of scientific or historical research in the public interest, for statistical purposes, or in connection with the exercise of official authority

13. Transfer or disclosure of data to external parties

- ☒ Personal data will be transferred or disclosed to parties other than the members of the research group.

Please describe the type of data that will be disclosed, the recipient and the grounds for disclosing data. *Research material, from which researchers have removed any direct personal information, will be provided to Journalisti magazine for journalistic work on the topic. This data may contain indirect identifiers and their combinations. Collected background information will not be given to the magazine. Any research material used in journalistic publications will be presented in a way that minimizes the risk of identifying individual respondents. The provided data will be destroyed when it is no longer deemed useful for journalistic work.*

14. Transfer or disclosure of data outside the EU/EEA

Will data stored in the research records be transferred to a country or an international organisation that is located outside the EU/EEA?

- ☒ No

15. Automated decision-making

Decisions will not be made by automated means.

EU General Data Protection Regulation (EU
2016/679), art. 12, 13, 14

16. Data protection principles

Protection of manual materials (e.g. paper documents):

- ☒ Other, please specify: *No manual material will be produced.*

Protection of digital materials (e.g. information systems and equipment):

- ☒ usernames
☒ password
☒ multi-factor authentication (MFA)
☒ other, please specify

Access management through limiting access to specific Tampere University user accounts.

Access is granted only to user accounts which are assigned to the researchers involved in this research.

Processing of data that directly identifies an individual:

- ☒ Directly identifiable data will be removed during the analysis stage

Protecting data in transit:

- ☒ other, please specify: If needed, data containing personal information will be transferred from device to another locally using USB-storages.

17. Processing of personal data after the research project has been concluded

- ☒ The research records will be destroyed

Where will the research materials be stored and for how long: The collected data will be stored in Tampere University for 3 years, after which an assessment regarding the usefulness of the data will be made. If this assessment finds that the data is no longer needed for research purposes, it will be erased. This assessment will be repeated every 3 years after until the data is erased

18. Data subjects' rights and possible restriction thereof

Data subjects have the following rights under the EU's General Data Protection Regulation (GDPR):

- Right of access
 - o Data subjects are entitled to find out what information the University holds about them or to receive confirmation that their personal data is not processed by the University.
- Right to rectification
 - o Data subjects have the right to have any incorrect, inaccurate or incomplete personal details held by the University revised or supplemented without undue delay. In addition, data subjects are entitled to have any unnecessary personal data deleted from the University's systems.
- Right to restrict processing:
 - o In certain circumstances, data subjects have the right to request the University to restrict processing their personal data until the accuracy of their data, or the basis for

EU General Data Protection Regulation (EU
2016/679), art. 12, 13, 14

processing their data, has been appropriately reviewed and potentially revised or supplemented.

- Right to object
 - o In certain circumstances, data subjects may at any time object to the processing of their personal data for compelling personal reasons.
- Right to lodge a complaint with a supervisory authority
 - o Data subjects have the right to lodge a complaint with a supervisory authority in their permanent place of residence or place of work, if they consider the processing of their personal data to violate the provisions of the GDPR (EU 2016/679). In addition, data subjects may follow other administrative procedures to appeal against a decision made by a supervisory authority or seek a judicial remedy.

Contact information:

Office of the Data Protection Ombudsman

Street address: Ratapihantie 9, 6th floor, 00520 Helsinki, Finland

Postal address: PO Box 800, FI-00521 Helsinki, Finland

Switchboard: tel. +358 29 56 66700

Fax: +358 29 56 66735

Email address: tietosuoja@om.fi

The Data Controller follows a GDPR-compliant procedure for responding to subject access requests.