

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

## **1. Title, nature and duration of research**

Title of research: Former unaccompanied minors and the transition to adulthood: Perspectives and insights from the lived experience in Finland – Project: 101150325 – UAM Adulthood – HORIZON-MSCA-2023-PF-01

☒ Case study

Duration of research: 02.09.2024 – 01.09.2026

Duration of data processing: Processing of data until 01.09.2031

## **2. Data controller**

☒ Research will be conducted in an employment contract with 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: Luke Macaulay

Address: Kalevantie 4, 33100 Tampere

Phone: number +358 50 401 5265

E-mail address: luke.macaulay@tuni.fi

## **4. Contact information of the Data Protection Officer**

[dpo@tuni.fi](mailto:dpo@tuni.fi)

## **5. Principal investigator**

Name: Luke Macaulay

Address: Kalevantie 4, 33100 Tampere

Phone number: +358 50 401 5265

E-mail address: luke.macaulay@tuni.fi

## **6. Researchers**

The research will be carried out by the PI, Luke Macaulay, and the fellowship supervisor, Mervi Kaukko, at the Faculty of Education and Culture, Tampere University.

## **7. Content of research records**

Written consent will be obtained prior to participants' participation in the study. Personal data processed includes names, contact information, age, gender, city of residence, city of birth, family status, education status, employment status, voice recordings, and possibly images. Participants will not explicitly be asked to provide information regarding their racial or ethnic origin, their political opinions, or their religious or political beliefs. However, it is recognised that participants may voluntarily provide such information during their participant research interview, which may have relevance to the aims and purpose of the study.

## **8. Sources of personal data**

Research participants will provide their name and contact information upon their expression of interest to participate in the study. Research participants will provide information regarding their age, gender, city of residence, city of birth, family status, education status, and employment status during a participant research interview which will be audio recorded. A research output of this project will be a book of poetry authored by the researchers and interested participants. At the launch event, participants may voluntarily be included in photos. Participants will not explicitly be asked to provide information regarding their racial or ethnic origin, their political opinions, or their religious or political beliefs. However, it is recognised that participants may voluntarily provide such information during their participant research interview, which may have relevance to the aims and purpose of the study.

## **9. Purpose of processing personal data**

The purpose of processing personal data is scientific research.

There are two research objectives linked to the action of this research. Research Objective 1 is to better understand the transition to adulthood of former unaccompanied minor youth in Finland. Research Objective 2 is to innovate new ways of co-constructing knowledge and art with participants. Better understanding the transition to adulthood of these youth is important, as a smooth transition to adulthood has been linked to social and economic success as well as wellbeing in the adult years. In the PI's previous research, he has explored the transition to adulthood of refugee youth who have migrated with their families. For these youth, the purpose of being an adult focused on the importance of relationships, especially with immediate family. To progress the state-of-the-art of knowledge, it is crucial to better understand these experiences from the perspectives of unaccompanied minor youth.

Data gathered during research interviews will create new knowledge about the transition to adulthood of these youth and the types of supports they utilise (and those that are lacking) to support this transition in Finland. The processing of personal data is needed for research logistics in the conduct of the study, as well as to fulfil the aims and purpose of the study – including to better understand the influence of the intersectionality of factors such as age, gender,

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education/employment status, etc. in the experiences of becoming adults for this cohort of youth. Including participants in key analysis and knowledge production is crucial to the participatory philosophy of this research. A research output of this project will be a book of poetry authored by the researchers and interested participants. Respecting the participants' contributions to this book, they will be offered to use their real name in the crediting of these contributions. The researcher and supervisor will carefully explain the risks and benefits of anonymised and non-anonymised involvement.

The goals and expected benefits of the research project are described in a separate information sheet, which will be given to the research participants.

#### **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:*

- ☒ 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
  - ☒ Political opinions
  - ☒ Religious or political beliefs

**Note:** Participants will not explicitly be asked to provide information regarding their racial or ethnic origin, their political opinions, or their religious or political beliefs. As such, the above types of personal data may be processed in the research project. It is recognised that participants may voluntarily provide such information during their participant research interview, which may have relevance to the aims and purpose of the study.

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

- ☒ No

#### **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

## **12. Transfer or disclosure of data to external parties**

- ☒ Processing activities will be outsourced (for example to a subcontractor).

Audio files of participant research interviews will be marked with an identification number and sent to an external service provider for transcription. In such instances, a data processing agreement (DPA) will be made. Sent audio files will be encrypted.

## **13. 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

## **14. Automated decision-making**

Decisions will not be made by automated means.

## **15. Data protection principles**

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

- ☒ In a locked room  
☒ In a locked cupboard

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

- ☒ usernames  
☒ password  
☒ multi-factor authentication (MFA)  
☒ other, please specify (digital data will be stored on OneDrive for Business provided by TAU, which is a cloud platform that offers file encryption at rest and file encryption in transit)

Processing of data that directly identifies an individual:

- ☒ Directly identifiable data will be removed during the analysis stage  
☒ The materials will be pseudonymised  
☒ The materials will be analysed without removing directly identifiable data: While all data analysed will have direct identifiers removed and will undergo a process of pseudonymisation, a

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research output of this project will be a book of poetry authored by the researchers and interested participants. Respecting the participants' contributions to this book, they will be offered to use their real name in the crediting of these contributions.

Protecting data in transit:

- ☒ secure transmission: OneDrive for Business provided by TAU
- ☒ file encryption: Audio files will be encrypted when sent to transcription service provider

#### **16. 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: Non-identifiable data only will be processed for five years after the completion of the study. All research materials will be stored in the storage services of TAU. Physical materials will be stored in a locked cupboard in a locked room. Digital material will be stored on OneDrive for Business provided by TAU, which is a cloud platform that offers file encryption at rest and file encryption in transit. Digital data will only ever be accessed through university devices (e.g., laptops) requiring username, password, and multi-factor authentication (MFA).

#### **17. 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 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

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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: Lintulahdenkuja 4, 00530, Helsinki, Finland

Postal address: PO Box 800, 00531, Helsinki, Finland

Switchboard: tel. +358 29 56 66700

Fax: +358 29 56 66735

Email address: [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

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