

Privacy Notice – Scientific Research

This privacy notice describes how we process your personal data in compliance with data protection legislation. In data protection legislation, the term “data subject” refers to the person whose personal data are processed. In this privacy notice, we refer to data subjects as “you”.

This privacy notice may be updated or edited if necessary. You will be notified of any significant changes as mandated by data protection legislation.

This privacy notice came into force on 28.2.2025

Data Controller

The Data Controller of the research project is:

Tampere University Foundation sr. (Tampere University)

Business ID: 284451-8

Kalevantie 4 FI-33100 Tampere, Finland

The research project will be conducted by salaried employees of Tampere University Foundation (Tampere University).

The contact person for questions about data processing is Kaisa Naskali Buddle, PhD Researcher, who can be reached at kaisa.naskalibuddle@tuni.fi, +358 50 4792247. To call Tampere University's switchboard, dial +358 (0) 294 52 11.

If you have general questions about data protection at Tampere University, please email our Data Protection Officer at dpo@tuni.fi.

1. Scope and purpose of data processing

Name of the research project: **Surroship in the making: the shared and contested meanings and practices of surrogacy in Australia.**

This is a one-time research project that will last until Kaisa Naskali Buddle has finished her doctoral dissertation. The estimate for graduation is by the end of the year 2027.

We will process your personal data as part of a scientific research project. The purpose of processing your personal data is to conduct the research project specified above.

The research project explores altruistic surrogacy in Australia from the perspectives of surrogates and intended parents. The research project is interested in understandings and meanings that are shared and contested by the actors. During this research project, personal data will be processed confidentially and securely by the principal investigator Kaisa Naskali Buddle. No-one else has access to the personal data.

The Principal Investigator (lead researcher) is responsible for overseeing the research project.

The research findings, reported in aggregate form so that individual research participants cannot be identified, are intended to be published in relevant scientific journals.

2. Lawful basis for processing personal data

The lawful basis for processing your personal data is:

- ☐ consent
- ☐ Data Controller's legal obligation
- ☐ vital interests
- ☒ public interest or the exercise of official authority

In case special categories of personal data (such as health data or criminal offence data) will be processed, the lawful basis for processing is:

- ☐ explicit consent
- ☐ protecting vital interests when the data subject is physically or legally incapable of giving consent.
- ☐ establishing, exercising or defending legal claims
- ☒ scientific or historical research in the public interest
- ☐ public interest in the area of public health on the basis of national legislation¹
- ☐ other lawful basis that complies with data protection legislation and is specified in national legislation:

For medical studies, Section 6, Paragraph 2 of the Finnish Data Protection Act (1050/2018) will apply.

3. Sources and types of personal data

Depending on the circumstances, we may collect personal data either directly from you or from other sources. We will collect data from:

¹ This refers to processing that is conducted to ensure the reliability of research, the safety of research participants, or compliance with statutory notification, reporting or archiving obligations.

- ☒ you as the data subject
- ☐ the following regular data sources:

We will process the following types of personal data:

General personal data: contact information

☒ Special category data (sensitive personal data): You may disclose this information based on your own discretion.

- ☒ health data:
- ☒ racial or ethnic origin
- ☒ political opinions or religious/philosophical beliefs
- ☐ trade union membership
- ☒ sexual behaviour or orientation
- ☐ genetic data
- ☐ biometric data for unique identification
- ☐ criminal convictions or offences

☐ Technical data:

☐ Other data:

We will process data on the following categories of data subjects:

☐ employees ☐ students ☒ research participants ☐ research staff ☐ others, please specify:

4. Transfer and disclosure of personal data

Under certain circumstances, your personal data may be transferred to a third country or an international organisation located outside the European Union (EU) or the European Economic Area (EEA). During such transfers, personal data will be appropriately protected by employing suitable transfer mechanisms (such as standard contractual clauses) and technical measures.

- ☒ Your personal data will not be transferred outside the EU/EEA.
- ☐ Your personal data will be transferred outside the EU/EEA as follows: ____ Describe the transfer mechanism and the protective measures:

- ☒ Your personal data will not be regularly disclosed to other data controllers.
- ☐ Your personal data may be disclosed to other data controllers under data protection legislation as follows:

Transfer of information from Australia to the EU is based on the consent from the research participants [GDPR article 6(1)(a) and when it comes to special category information article 9(2)(a).].

In some cases, your personal data may be processed by data processors with whom we have signed appropriate data processing agreements. Interviews may be transcribed by a company with which Tampere University has an agreement.

5. Protecting personal data

Your personal data will be protected using appropriate technical and organisational measures. We will protect your data through technical measures, including antivirus software, firewalls and regular software updates. Users who can access personal data are required to log in with a username and password or, in some cases, with multi-factor authentication.

We will also protect your data through organisational measures. Our staff are obligated to maintain confidentiality, and access to data is restricted. If necessary, we will implement additional safeguards to protect data, such as separate storage locations.

Any physical documents will be safeguarded by storing them in locked facilities.

Materials containing personal data will be:

☒ pseudonymised

☒ stored with personally identifiable information, which is necessary for the following reasons:

Interview recordings will be stored until a pseudonymised transcription has been done.

During this research project, your data will also be protected through the following measures: Data containing personally identifiable information will be encrypted.

6. Retention period for personal data

We will retain your personal data for only as long as necessary, as determined on a case-by-case basis. The retention period also depends on the requirements set out in data protection legislation. We will adhere to our Data Management Plan and all applicable legislation when determining the retention period of personal data.

Your personal data will be retained as follows: *contact information will be retained until the research has been finalised but erased if requested by research participants. Interview recordings will be securely retained only until a pseudonymised transcription has been finalised and then erased. Pseudonymised transcriptions will be retained until the end of the research project and*

for 10 years thereafter for potential further research. With your specific consent, pseudonymised interview material will be archived in the Finnish Social Science Data Archive.

After the research project has been completed, the research records containing personal data will be:

- ☐ destroyed in their entirety
- ☒ anonymised and archived without personally identifiable information
- ☐ archived with personally identifiable information

7. Profiling and automated decision-making

We will not use your personal data for profiling or automated decision-making purposes.

8. Data subjects' rights and how to exercise them

Data protection legislation affords certain rights to data subjects, depending on the lawful basis for processing their personal data. Under certain circumstances, your rights may be restricted, for example, due to the Data Controller's legal obligations or if personal data are processed for scientific research, statistical or archiving purposes. If your rights have been restricted, the Data Controller will implement appropriate and necessary technical and organisational measures to protect your privacy. As a data subject, you have the following rights which you can exercise by contacting our Data Protection Officer at dpo@tuni.fi.

Right of access

You have the right to request confirmation of whether we hold your personal data and to receive a copy of the data we hold.

Right to rectification

You have the right to request that any incorrect or incomplete personal data we hold to be revised or supplemented. You are also entitled to have any unnecessary personal data erased from our records.

Right to erasure

You have the right to request the erasure of your personal data from our records ("right to be forgotten") under certain circumstances.

Right to restrict processing

You may have the right to restrict the processing of your personal data in certain cases defined by law. For example, this right may apply if you believe the personal data we hold about you is incorrect or that your data are being processed in violation of data protection legislation, or if you have opposed the processing of your data.

Right to object

In certain circumstances, you have the right to object to the processing of personal data on grounds relating to your particular situation.

Right to data portability

Under certain circumstances, you have the right to request that the personal data you have provided be transferred to another system.

Right not to be subject to automated decision-making

You have the right not to be subject to decisions based solely on automated processing (such as profiling) that produce legal effects concerning you or otherwise similarly and significantly affect you. However, there are exceptions to this prohibition.

Withdrawing consent

If your personal data is being processed based on your consent, you have the right to withdraw your consent at any time.

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority (Data Protection Ombudsman), if you believe that the processing of your personal data violates data protection legislation.

Office of the Data Protection Ombudsman

Street address: Lintulahdenkuja 4, FI-00530 Helsinki, Finland

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

Switchboard: +358 29 56 66700

Fax: +358 29 56 66735

Email address: tietosuoja@om.fi