

DATA PROTECTION NOTIFICATION
Lappeenranta-Lahti University of Technology LUT
EU's General Data Protection Regulation
(2016/679), Articles 13 and 14
Date: 1.1.2026

1. Data controller:

On behalf of LUT University

Business ID: 0245904-2

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Phone: +358 294 462 111

E-mail: info@lut.fi

Sections 2.1 and 2.2 of the data management plan state that the purpose and means of processing personal data in the research project are determined jointly by the consortium partners, which is why they act as joint registrars in the project.

2. Data controller's representative and contacts

Ilona Bontenbal, Ilona.bontenbal@lut.fi, +358 504010607

3. Data protection officer

Ilona Saarenpää, Legal Counsel

Email:

Phone: 0294 462 111 dataprotection@lut.fi (switchboard)

Address: Mukkulankatu 19, 15210 Lahti, Finland

4. Purpose of data processing

The purpose of the data processing is doing research to understand the perceptions that various stakeholders (migrant employees, employers, policy makers, politicians and experts) have about how the rise of AI and digitalization are rapidly transforming work and skill demands and how this impacts the labour market position of migrant workers in Finland. Through this, the purpose is to be able to offer better policy solutions to aid migrant in their integration, inclusion and reskilling. The data processing will include interviewing various stakeholder groups (migrant employees, employers, policy makers, politicians and experts). We will also conduct a survey among migrant employees in the IT and health care sectors.

The following information will be gathered: the interviewees' places of residence, country of origin, educational background, age, gender, occupation, political party membership (in the case of policy maker interviews and survey) and voice recordings.

The research concerns processing of special categories of personal data and this will be taken into consideration during the project. The participants' explicit consent for the processing of the personal data in question will be obtained. Racial or ethnic origin will not be asked for, but

life and migration histories might reveal this in some cases. These categories will not be used in the publications. Despite this, interviewees are clearly informed that this information may be disclosed for the reasons mentioned above and it is emphasized that these categories will not be published. In addition to the personal data mentioned, the interview material may include other personal data, including, for example, opinions and statements expressed in the interviews.

OneDrive will not be used to process special categories of personal data.

5. Legal basis of data processing

The processing of participant's data is necessary on the grounds of the performance of a task carried out in the public interest under Article 6(1)(e) and for scientific and historical research purposes under Article 9(2)(j) of EU's General Data Protection Regulation.

6. Content of data filing system and storage period

The data is stored on password protected university computers. The interview data recordings are deleted immediately once they are transcribed. During transcription the data is also pseudonymised. The pseudonymised transcriptions will be stored for 5 years after the project has ended and it way that makes it impossible to retrieve afterwards. The support of LUT it-support team will be solicited in this. Quantitative data on policy makers' and students' opinions will only be collected without names of the participants.

7. Information systems employed

Interview data will be processed in qualitative software programme Nvivo and in Microsoft Words. The Nvivo cloud service will not be used. Data will not be processed on Teams or OneDrive. A survey tool will be employed to conduct the online survey, in accordance with LUT software licenses.

8. Data sources

In the project, data will be collected primarily in relation to two labour market sectors 1) the IT sector and 2) the health care sector. In relation to these sectors, we will interview a) migrants working in these sectors, b) employers from these sectors, c) social partners representing these sectors (labour unions etc.), d) policy makers involved in these sectors, e) politicians and f) experts (academics, project leaders etc.).

In addition to the interviews, we will conduct an online survey. The survey will be conducted in the selected sectors, among migrant employees about their perception on AI, digitalization and reskilling.

Interview and survey data will be collected solely in Finland.

In addition, data will also be collected from article data based (such as Web of Knowledge and Web of Science) to conduct a systematic literature review.

External data bases will not be used to collect personal data.

Information about potential interviewees can also be obtained from the database of partner NGOs.

The data used during the recruitment phase of the interviewees and all information about them will be retained and protected for the duration of the study and thereafter. The data will be treated in such a way that the contact details of the interviewees are protected as also specified in sections 10, 11 and 12 of this privacy notice.

9. Use of cookies

Browser-based data filing systems employ cookies to process personal data. A cookie is a small text file that the browser saves on the user's device. Cookies are used to implement services, facilitate login, and enable the compilation of statistics on services. Users may prevent the use of cookies in their browser programmes, but this may prevent the system from operating correctly.

No cookies are used in the processing of personal data.

10. Data transfer and disclosure

The data will be gathered by the researchers in the project (not outsourced). Interview data will be transferred from the audio recorded onto a password protected university computer and LUT internal network drives. After this the data will be transcribed by the researcher working and in some cases third-party transcription services. Once the interviews are transcribed the original audio files will be deleted. Only pseudonymised transcriptions will be shared within the research group. This can also include sharing data outside the LUT university team with researchers that are part of the larger consortium (working at the University of Jyväskylä, Hanken School of Economics, Aalto University, University of Helsinki and VTT). Other consortium partners will have access to the already analyzed data (not the raw data), and the data can be further used in other phases of this research project.

11. Data transfer and disclosure beyond the EU or EEA

Data will not be transferred outside the EU or EEA.

12. Safeguards for data processing

Data will be only be processed by the researchers working on the project. Data will be saved on password protected computers and only pseudonymised data will be stored. Original audio files will be deleted in a way that makes it impossible to restore them.

13. Automated decision-making

No automated decision-making will be used.

14. Rights of the data subject

Data subjects have the right to withdraw their consent if the data processing is based on consent.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if the subjects consider that the data processing regarding them is in breach of data processing legislation in force.

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

- a) Right of access to data concerning the data subject (article 15)
- b) Right to rectification of data (article 16)
- c) Right to erasure of data (article 17). The right to erasure shall not apply if the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure prevents or significantly hinders the data processing
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20).
- f) Right to object (article 21).

Data subject's rights under the EU's General Data Protection Regulation do not automatically apply to all data processing.

The liaison in matters related to the data subject's rights is the data protection officer; contact details in section 3.