**Data Processing Impact Assessment (DPIA) for Scientific Research**

Data Processing Impact Assessment (DPIA) is designed to identify, evaluate, and control risks involved in the processing of personal data. Carrying out impact assessments demonstrates compliance with the data protection legislation and is part of the required documentation.

Information on impact assessments:

<https://tietosuoja.fi/en/impact-assessments>

An impact assessment must be carried out if the anticipated processing of personal data is likely to result in a high risk to people’s rights and freedoms. An impact assessment is especially important in scientific research when the operation involves

* using new technologies
* processing of personal data relating to criminal convictions or offences or of special categories of personal data, such as data concerning health or revealing ethnic origin, political opinions, religious beliefs, or sexual orientation
* profiling or automated decision-making
* processing of genetic data
* the controller derogating from the data subject’s right to obtain information. An impact assessment must be carried out when personal data is collected from a source other than the individual and the data subject’s right under the General Data Protection Regulation to obtain information is derogated from, due to
  + notification proving impossible (especially if the data are processed for archiving in the public interest or for scientific and historical purposes or for statistical purposes)
  + notification requiring unreasonable effort (especially if the data are processed for archiving in the public interest or for scientific and historical purposes or for statistical purposes)
  + notification preventing the achievement of the purposes of the processing or considerably hampering processing.
* when intending to derogate from the rights of the data subjects and process special categories of personal data. In these cases, the impact assessment must also be delivered to the Data Protection Ombudsman before beginning the research.

More detailed list of processing operations which require data protection impact assessment:

<https://tietosuoja.fi/en/list-of-processing-operations-which-require-dpia>

**Project name:**

*Write text by clicking here.*

Contact person for matters related to personal data

Name:

Telephone number:

Email:

1. **Description of the processing of personal data**
   * **Nature of the processing of personal data**

*Write a short description of what kind of processing of personal data you are planning; what are the uses of the personal data in the research*

* + **Scope of the processing of personal data**

*Describe the type, amount, and regional coverage of the data to be processed; What kind of data will be collected i.e. which categories of personal data (e.g. name, address, photo, DNA sample etc.) are to be processed? How much data is collected and how often is this done? How many individuals the processing of personal data concerns? What is the retention period for the personal data?*

* + **Description of the processing operations** (how the personal data is processed)

*Describe what kind of processing the data will be used for e.g. collecting, analysing, altering, combining, removing etc.; where and how the personal data will be collected*

* + **The resources to be used to process personal data**

*Explain who will have access to the data, which data systems, applications, networks, documents, and channels of data transfer will be used*

1. **Measures ensuring the necessity and proportionality of the processing operations**
   * **Name one or more specified, explicit, and legitimate purposes for the processing of personal data**

*The purpose can be e.g. scientific research*

* + **Identify the legal basis for the processing of personal data**

*E.g. The specific consent of the data subject or scientific research based on the public interest*

* + **How it has been ensured that the data is appropriate, relevant, and limited to the amount necessary for the purposes of the processing of personal data**

*Explain the necessity of processing the data in relation to the purpose and where is has been defined, e.g. in the research plan*

* + **How it has been ensured during the life cycle of the personal data that the data is stored in a such format that the data subject is identifiable only as long as necessary for achieving the objectives of processing the data**

*E.g. pseudonymisation or anonymisation of personal data or destroying it as soon as it is no longer needed*

1. **Measures promoting the rights of the data subjects in research**
   * **Information provided to the data subject**

*Explain which channels you have used to inform the data subjects about the processing of personal data, e.g. announcement, privacy notice, discussion*

* + **How the right of the data subject to access their data will be ensured?**

*Explain how the data subject can access their data e.g. through a form, a contact person, the Data Protection Officer. Include information on whether the right to examine data is derogated from based on the Article 89 of the General Data Protection Regulation.*

* + **If the data subject has the right to move their data from one system to another, how is this implemented?**

*This right rarely applies to research because the right does not exist in processing for archiving purposes of tasks in the public interest. If the basis for your data processing is research based on the public interest, write here that* ***the right to transfer data will not apply to this research project****. The right applies in cases of automated processing of personal data or when the basis for the processing of personal data is consent and the personal data has been provided by the data subject. If the right applies, explain how the data subject can exercise their right e.g. by contacting the controller.*

* + **How is the right of the data subject to rectify/erase their data implemented?**

*This right applies when the basis of processing is consent. If the basis is scientific research based on the public interest, this right may be derogated from in cases where the right is likely to render impossible or seriously impair the achievement of the specific purposes of the research; in these cases, you can write that the right is derogated from in this research project and justify why this is done. If the right applies, explain how the data subject can exercise their right e.g. by contacting the controller.*

* + **How is the right of the data subject to object to or restrict the processing of their personal data implemented?**

*Explain who the data subject should contact if they e.g. deny the accuracy of the personal data and want to object to or restrict the processing of their personal data.*

* + **Are processors of personal data used in the research and how have they been instructed?**

*Personal data processors are external partners that process personal data on behalf of the controller or that have access to the personal data collected by the controller e.g. transcribers of the data, IT service providers. Explain does the agreement with them include an attachment on data protection or are the instructions for processing of personal data included in the main agreement (information listed in Article 28)*

* + **Identify the instances where the research includes transfer of personal data outside Finland and the protective measures related to it.**

*Explain whether personal data will be transferred out of the EU and ETA and if this is done, specify the protective measures applied, based on e.g. sufficient level of data protection, the conditions provided by the EU, the regulations of the company, or the consent of the data subject*

1. **Risk assessment and required protective measures**

Different types of risks may befall the data subject due to i.e. a) unauthorised disclosure of personal data or unlawful access b) personal data being lost, and c) personal data being altered. Processing of personal data may also inflict other risks on the data subjects.

*Identify the risks and threats for the data subject associated with the processing of personal data. Assess the impact and likelihood of the risk or threat and explain what kind of protective measures are taken in your research to reduce or avoid risks. Use the model charts on the following pages/attachments OR write an assessment on the risks and the protective measures used to reduce them.*

* + **Risks**

*List the risks and threats you have identified. See attachment 1*

* + **Assess the impact of a realised risk or threat for the data subject**

*Define what kind of impacts the a) unauthorised and inappropriate use of the data b) personal data being lost and c) personal data being altered could have on the data subject. See attachment 2.*

* + **What kind of protective measures have been taken to reduce or avoid risks?**

*List the protective measures here or tick the appropriate sections in attachment 3.*