

Information for the subject about the project “Changing Finnish expatriatism 2”

You are participating in a scientific study carried out at the Migration Institute of Finland. This privacy policy outlines how your personal data will be processed during the study.

1. Controller

The Migration Institute of Finland

2. Description of the study and personal data processing

The Changing Finnish expatriatism 2 project maps the life situations of expatriate Finns, the reasons for moving abroad, well-being, social networks, contacts, communication and media use, activities within the Finnish expatriate community and service needs, political participation, return migration, and identity. Data collection for the project is carried out as a web-based survey with Webropol during November-December 2025. The survey link is widely disseminated to Finns abroad, covering current and former Finnish citizens who have moved abroad and who have lived abroad for an extended period, as well as Finnish descendants. Several thousand responses are expected (in a corresponding survey in 2020, 2,047 responses were received through online). Based on the data collected through the survey, a report will be prepared and published in the Migration Institute of Finland's Reports series. The project is conducted at the Migration Institute of Finland by Research Fellow, PhD Tuire Liimatainen, and is funded by the Ministry of the Interior (1 October 2025 - 31 January 2026).

This is a scientific research project of general interest, conducted anonymously using the Webropol survey tool without collecting direct personal identifiers (e.g., name, email address). In connection with the mapping of respondents' background information, indirect personal data are collected and necessary for the statistical processing of survey responses. These data will help to understand the backgrounds of the research participants and contemporary expatriate Finnish identity (e.g., gender, age, citizenship, mother tongue, religion, educational background, employment status, income level, other minority identities). Respondents are asked for their consent to the processing of personal data for the purposes defined in the project. The data will be used for research purposes only and, upon completion of the project, stored in the Finnish Social Science Data Archive as well as in the archives of the Migration Institute of Finland for further scientific use. To ensure anonymization, the data are processed so that any background or identifying information that could, alone or in combination, identify individual respondents is removed.

3. Contact person responsible for the research group / joint register

The subjects can direct any requests relating to this study (including requests concerning the rights of the data subject pursuant to Chapter 3 of the GDPR) to the contact person below:

Name: Tuire Liimatainen
Address: Hämeenkatu 13, 20500 Turku, Finland
E-mail: tuire.liimatainen@migrationinstitute.fi

4. Persons who participate in personal data processing

All of the researchers working on the project (Tuire Liimatainen) will collect material and process personal data as part of joint material collection and analysis of the material. All of the persons working on the project will only process data when necessary and to the extent necessary in order to fulfil the purpose and objective of the project. They are also bound by an obligation to secrecy.

5. Name and duration of the study

Project title: Changing Finnish expatriatism 2

Project duration: 1 October 2025 - 31 January 2026

Processing period for personal data: The processing of personal data for the study will end no later than five years after the completion of the project (January 2031).

6. Legal grounds for processing personal data

Personal data are processed in accordance with the grounds for processing personal data given in Article 6(1) of the EU GDPR:

- ☒ consent of the data subject;
- ☐ processing is necessary for the performance of a contract;
- ☐ processing is necessary for compliance with a legal obligation to which the controller is subject;
- ☐ processing is necessary in order to protect the vital interests of the data subject;
- ☒ processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller:
 - ☒ processing is necessary for scientific or historical research purposes or statistical purposes;
 - ☐ processing is necessary for archiving scientific material or cultural heritage material;
- ☐ processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

7. Personal data contained in the research material and protective measures

Indirect personal data are collected in the survey in connection with mapping respondents' background information. These include gender, age, citizenship, mother tongue, religious belief, educational background, employment status, income level, family situation, political opinion, and other minority identities. Only those indirect personal data necessary to achieve the objectives of the project are collected. The indirect personal data are processed for the statistical analysis of the survey responses and are not combined in ways that could allow the identification of individual respondents.

According to the principles of the Finnish National Advisory Board on Research Integrity TENK (see https://tenk.fi/sites/default/files/2021-01/Ethical_review_in_human_sciences_2020.pdf), ethical review is not required. Moreover, the data used in the project are based on the informed consent of the respondents. A separate data management plan has been prepared for the project.

8. Special categories of personal data (sensitive personal data categories)

This project will investigate/request the following personal data:

- ☒ Racial or ethnic origin
- ☒ Political opinions
- ☒ Religious or philosophical beliefs
- ☒ Trade union membership
- ☐ Genetic data
- ☐ Biometric data for the purpose of uniquely identifying a natural person
- ☐ Data concerning health
- ☒ Data concerning a natural person's sex life or sexual orientation

Indirect personal data include the following categories of sensitive personal data: political opinions and religious and philosophical beliefs. In addition, it is possible that the following categories of sensitive personal data may be mentioned in the open-ended survey responses: race or ethnic origin, and sexual orientation. Information about the language used to respond to the survey (Finnish, Swedish, or English) is also retained.

Special categories of personal data shall be processed based on the following acts and decrees: EU General Data Protection Regulation, Articles 9 (special categories of personal data) and 10 (personal data relating to criminal convictions and offences) and Sections 6 and 8 of the Data Protection Act (Tietosuojalaki, 1050/2018):

- ☒ consent of the data subject;
- ☐ processing is necessary in order to protect the vital interests of the data subject;
- ☒ processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller:
 - ☒ for scientific or historical research purposes or statistical purposes;
 - ☐ processing is necessary for archiving scientific material or cultural heritage material.

9. Sources of personal data

Personal data is collected directly from the study participants. Personal data is disclosed on a voluntary basis.

10. Transferring personal data to and sharing personal data with third parties

Personal data will not be transferred to recipients outside of the Migration Institute of Finland.

11. Transfer of personal data outside of the EU or EEA

Data are not disclosed outside of the European Union or the European Economic Area.

12. Automated decision-making and protective measures requiring compliance

Automated decision-making will not be carried out on the personal data to be processed. The following protective measures will be applied to personal data:

- ☐ The material is confidential.
- ☒ Protective measures to be applied to written material:

Any written material will be stored in lockable cabinets in a locked office on the Migration Institute of Finland's premises. The Institute is also locked during the day, and therefore only named persons who are personal data processors shall have access to the written material.

- ☒ Personal data processing carried out on IT systems:

Data to be processed on IT systems:

- ☒ username
- ☒ password
- ☒ multi-factor authentication (MFA)
- ☐ access control using web addresses (IP addresses)
- ☐ use registration (collection of log data)
- ☒ access control
- ☐ other, please specify:

Survey data will be stored in a data-secure and password-protected Seafiler folder. During the research project, only project researchers may access personal data.

Processing of directly identifiable personal data:

- ☐ Directly identifiable personal data will be deleted during the analysis phase.
- ☐ Material to be analysed contains directly identifiable personal data.

Grounds:

Data encryption during data transfers:

- ☒ encrypted data transfer: encrypted VPN connection, saved only on own protected drive. Material will be stored and transferred data-securely within the research group.

13. Personal data processing after the research ends

The research material will be archived:

- ☒ without identifying data
- ☐ with identifying data

Where and for how long the research material will be stored:

Material will be saved within a year after the project ends in the Finnish Social Science Data Archive and the archives of the Migration Institute of Finland for further scientific use. Use of the data requires registration.

14. Your rights as a data subject and exceptions to such rights

You may contact the project leader Tuire Liimatainen for more information on your rights in accordance with the GDPR and how to exercise them.

15. Exceptions to the rights of the data subject

Based on the General Data Protection Regulation and the Finnish Data Protection Act, certain exceptions can be made to the rights of the data subject, if the grounds for processing personal data are scientific research, and if exercising the rights would make the purpose of the processing (in this case, scientific research) either impossible or would pose significant detriment to processing.

The need to make exceptions to the rights of the data subject is always assessed on a case-specific basis. The research in this privacy policy will likely necessitate exceptions to the following rights of the data subject (not selected ☐, selected ☒):

- ☐ Right of access by the data subject (Art. 15 of the GDPR)
- ☐ Right to rectification (Art. 16 of the GDPR)
- ☐ Right to erasure (“right to be forgotten”) (Art. 17 of the GDPR)
- ☐ Right to restriction of processing (Art. 17 of the GDPR)
- ☐ Right to data portability (Art. 20 of the GDPR)
- ☐ Right to object (Art. 21 of the GDPR)

Grounds for exceptions and scope of the exceptions:

Unless otherwise prescribed by data protection legislation, the data subject has:

- Right of access (the right to access personal data)
 - The data subject has the right to know whether their personal data is being processed and, where that is the case, the categories of personal data concerned.
- Right to rectification
 - The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them. The data subject also has the right to request that unnecessary personal data is erased.
- Right to erasure
 - In exceptional situations, the data subject has the right to have their personal data erased entirely from the controller’s data file (the right to be forgotten).
- Right to restriction of processing
 - In certain situations, the data subject has the right to request the restriction of their personal data processing while their personal data are appropriately checked and rectified or supplemented.
- Right to object
 - In certain situations, the data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning them.
- Right to transfer data from one system to another
 - In certain situations, the data subject shall have the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.
- Right of the data subject to lodge a complaint with a supervisory authority

- Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to them infringes the EU GDPR (EU) 2016/679. The data subject also has the right to an effective judicial remedy and other legal remedies.

16. Right to lodge a complaint

You have the right to lodge a complaint with the Office of the Data Protection Ombudsman if you feel that your personal data has been processed in a manner that infringes data protection legislation.

Contact details for the Office of the Data Protection Ombudsman:

Office of the Data Protection Ombudsman
Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland
Postal address: PO Box 800, 00531 Helsinki, Finland
Switchboard: 029 566 6700
Email (registry): tietosuoja@om.fi