

**Research and evaluation project Oulu2026.****Privacy notice for the survey conducted as part of the project regarding enterprises**

This is a privacy notice for the survey aimed at enterprises conducted in Center for Cultural Policy Research Cupore's research project "Research and evaluation project Oulu2026". The purpose of this document is to provide information on how Cupore processes personal data in connection with conducting the survey.

**1 Data controller of the research project**

The data controller of the research project is Center for Cultural Policy Research Cupore, whose address is Pitkäsillanranta 3 B, FI-00530 Helsinki, Finland.

In questions concerning data protection in general, please contact Cupore's data protection officer (Director Johanna Tuukkanen). The person responsible for the study is Mervi Luonila, whom you can contact in questions related to the study.

**2 Nature of the study**

The study will be implemented as a cross-sectional study.

The duration of the entire project is 2018–2027.

The survey will be conducted 13.3.-12.4.2025.

**3 Research group**

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Cupore has committed to following the Finnish National Board on Research Integrity's guidelines on the Finnish Code of Conduct for Research Integrity and to keeping confidential all personal data processed in the study.

**4 Purpose and legal basis of the processing of personal data**

The personal data contained in the register will be processed as research data in scientific research.

The processing of your personal data is necessary for the implementation of scientific research in the public interest on the basis of Article 6(1)(e) of the General Data Protection Regulation and section 4(3)

of the Data Protection Act. Participants have the option to state their willingness to further participation in follow-up research by giving their contact details on a separate form. The basis to handling personal information on the form regarding further participation is consent.

The research will monitor and evaluate the European Capital of Culture 2026 theme year, the impacts of related activities, and the longer-term impact on Oulu and neighbouring municipalities. The survey directed at enterprises gathers information on their views regarding the value of culture in regional development and their hopes for the impacts of Oulu2026-activities to the area and the workings of the enterprises.

Data may also be processed, to the extent applicable, in other research projects conducted by Cupore's researchers.

## **5 Data sources**

The research data will be collected from the participants themselves through a survey.

## **6 Personal data to be collected**

The survey collects and processes the following personal data:

- Follow-up research form: name, organization, e-mail
- Main survey: personal data that may appear in open-ended responses

Only the data necessary for the purpose and implementation of the study will be processed. Direct identifiers cannot be combined with survey responses. You cannot be identified from the scientific publication or other research results to be published based on the study. Direct personal data in the follow-up research form will be deleted after the follow-up research is completed.

## **7 Processing of special categories of personal data**

Special categories of personal data are not being handled in the research.

## **8 Sharing personal data**

The recipients of personal data include the third parties, data controllers and data processors to whom personal data contained in the register are transferred or disclosed.

Data will be disclosed and/or transferred to the following parties:

Data will be transferred to the system providers Webropol (survey platform) and Neuvoa-ICT (IT service provider) who will process personal data on behalf of Cupore when providing their platform for Cupore. The system providers will process personal data only to the extent that they participate in the implementation of the controller's service.

Research data containing your personal data can later be utilized in Cupore's other projects or publications. Research data may be disclosed to a third party, such as scientific publication, for the peer review process of scientific publication or for other purposes necessary for the validation or publication of scientific research results.

At the end of the research project, the survey data may be transferred to the Data Archive (<https://www.fsd.tuni.fi/en/>). The Data Archive will then modify the anonymized dataset for long-term storage and further use.

## **9 Transfer of data outside the EU or EEA**

The data will not be transferred outside EU/EEA countries.

## **10 Retention period of personal data**

The retention period of personal data is determined by, among other factors, the purpose of the research, its duration, archiving in the public interest, and the requirements of the research commissioner.

The research data will be stored at Cupore for the time being for scientific research in the public interest.

## **11 Personal data protection principles**

Your personal data will be processed and stored in secure systems. The computers and information systems used will be protected by user IDs and strong passwords. Access to research data containing personal data will be technologically limited so that only the persons participating in the study and the persons necessary for conducting the study will have access to your personal data.

The data will be stored on Cupore's online data storage, which meets the storage requirements set out in Cupore's data management policy.

Direct and unnecessary personal data will be removed from the data once the research has been completed.

## **12 Rights of the subject as a data subject**

Where the processing of personal data is necessary for the performance of a task carried out in the public interest (scientific research, section 4(3) of the Data Protection Act), the subject shall have:

- Right of access to data
- Right to have data rectified
- Right to restrict the processing of data
- Right to object to the processing of personal data

In the event that the conduct of the study does not require or no longer requires the identification of the data subject, the controller will not be obliged to obtain additional information for the purpose of identifying the data or the data subject solely for the purpose of the exercise of the data subject's rights.

If the controller does not identify data that could be linked to a particular data subject, the data subject will not have the right to inspect the data, have the data rectified, object to the processing of the data, or have the data erased. However, these rights will not be restricted if the data subject provides additional information based on which they can be identified in the data.

### **13 Right to lodge a complaint with the supervisory authority**

The data subject has the right to lodge a complaint with the supervisory authority if the data subject considers that the processing of their personal data is in violation of applicable data protection regulations. The national supervisory authority in Finland is the Data Protection Ombudsman (read more: <http://www.tietosuoja.fi/en>).

### **14 Updates**

Cupore may update this privacy policy. The privacy policy was created on 11th March 2025 and was last updated on 7th August 2025.