Citizens' Assembly on Work-Based Immigration
Future of Work-Based Immigration project

Duration of the research: 1 August 2026 – 30 September 2027
Project website: utu.fi/citizensassembly2026

1. Data controller

University of Turku, FI-20014 University of Turku

Contact point:
Research Group on the Reformation of Democracy (RIDE)
Address: Faculty of Social Sciences / Department of Philosophy, Political Science and Contemporary History, Assistentinkatu 7, FI-20500 University of Turku
Email: demokratia@utu.fi

2. Data Protection Officer's contact information

The Data Protection Officer of the University of Turku can be reached by email at dpo@utu.fi and by phone at +358 29 450 3009.

3. Description of the research and personal data processing

The study investigates the effects of the Citizens' Assembly on the participants and on decision-making. The aim is to generate knowledge about the views of people living in Finland on work-based immigration, and to develop and assess democracy innovations such as Citizens' Assemblies.

Personal data obtained from the Digital and Population Data Services Agency and data provided by respondents themselves are used to send invitations concerning the Citizens' Assembly, to contact participants about matters related to the Citizens' Assembly, and for research purposes.

The study is carried out by researchers in the Research Group on the Reformation of Democracy at the University of Turku. The Citizens' Assembly is convened by the Ministry of Economic Affairs and Employment and Sitra, the Finnish Innovation Fund. Sitra and the Ministry will not analyse the research data at the level of individual persons, but they will receive the Citizens' Assembly's joint statement and the key findings of the research.

4. Persons involved in personal data processing

Members of the Research Group on the Reformation of Democracy at the University of Turku and, where applicable, separately authorised processors mentioned in section 11. The members of the research group are listed on the website utu.fi/demokratia under "Tutkimusryhmä" (Research Group).

5. Duration of personal data processing

Duration of the research: 1 August 2026 – 30 September 2027.

Survey material containing personal data will be processed for the duration of the research project and for at most one year after it has ended. Audio recordings will be processed for the duration of

the research project and for at most one year after it has ended. Video recordings will be processed only for the duration of the research project. Personal data collected for the payment of compensation for participation in the Citizens' Assembly will be stored, in accordance with the university's practice, for 20 years.

6. Lawful basis of personal data processing

The processing of personal data is based on Article 6(1) of the GDPR:

☒ task carried out in the public interest:
- ☒ scientific or historical research or statistical purposes
- ☐ archiving of scientific or cultural heritage materials

☐ consent of the data subject
☐ compliance with a legal obligation to which the controller is subject
☐ legitimate interests of the controller or a third party

The processing of personal data collected for the payment of compensation is based on Article 6(1)(b) of the GDPR, that is, on the contract between the data subject and the controller, which is formed when the data subject provides their data to the controller in order to receive the compensation. The processing is necessary for the performance of the contract between the controller and the data subject concerning the payment of the compensation.

The disclosure of the personal data of persons who have received compensation to the Finnish Tax Administration is based on Article 6(1)(c) of the GDPR. The processing is necessary for the controller to comply with its legal obligation.

7. Personal data included in the research

The following personal data will be processed in the study: name, year of birth, mother tongue, street address, postal code, post office, municipality of residence, email address, phone number, gender, education, life situation, and information needed for the in-person meetings of the Citizens' Assembly (dietary requirements and accessibility needs). In addition, the participants' voice and image will be recorded to enable transcription of the discussions.

For the purpose of paying the participation fee for the Citizens' Assembly, the following personal data will be collected: participant's name, address, phone number, personal identity number, and bank account number. The personal data collected for payment of the participation fee, as well as the data collected for the arrangements of the in-person meetings, will not be linked to the research data.

Name and address data, email address and phone number will be stored separately from other survey responses and will be removed from the research data after the end of the research project, unless the participant has given separate permission to retain the data for a longer period.

The discussions of the Citizens' Assembly will be recorded, and the recordings will be transcribed and anonymised for later use in scientific research. Recording will be carried out at the in-person meetings using the research team's recording devices, and at the online meetings using the recording function of the Zoom software. In the online meetings, participants' audio and video will be captured in the Zoom application as part of the recording of the discussions. The audio and video will not be used for biometric identification. Transcription will be carried out using the secure Transcribe software provided by the University of Turku's AI services.

Notes made during the Citizens' Assembly may also be edited or summarised using an AI-based chatbot. The chatbot will be created on the University of Turku's AI services platform, and the data entered into it will not be used to train or develop the language model. No personal data will be entered into the AI chatbot.

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

The following special categories of personal data will be processed in the research: political opinions and attitudes, and the respondent's migration status and background.

The processing of special categories of personal data is based on Article 9(2) of the GDPR:

☒ task carried out in the public interest:

- ☒ scientific or historical research or statistical purposes
- ☐ archiving of scientific or cultural heritage materials

☐ consent of the data subject

☐ compliance with a legal obligation to which the data controller is subject

9. Sources of Personal Data

The following personal data of persons to be invited to the study will be obtained from the Digital and Population Data Services Agency under a data permit granted in accordance with the Act on the Population Information System and the Certificate Services of the Digital and Population Data Services Agency (661/2009): name, year of birth, mother tongue, home address, postal code, post office and municipality of residence. Other personal data will be collected from respondents themselves using electronic questionnaires with the Qualtrics survey tool.

The participant's image and voice will be saved in connection with the recording of the discussions.

10. Personal Data Protection Measures

Personal data processed in information systems is protected in the following ways:

☒ user ID and password

☐ logging of use

☐ access control

☐ encryption

☒ two-factor authentication

☐ other, specify:

Processing of Direct Identifiers:

☐ The data is collected without direct identifiers

☒ Direct identifiers are removed during the analysis phase:

The discussion recordings will be transcribed, and the transcripts will be pseudonymised for analysis. Pseudonymisation means that direct identifiers are separated from the research data and replaced with identification codes. The transcripts will be anonymised again before any possible archiving or other further use outside the research group.

The survey data will be pseudonymised before analysis. The survey data will be anonymised further before it is archived in the Finnish Social Science Data Archive or the data archive Zenodo, so that individual persons can no longer be identified.

☐ The data is analysed with direct identifiers because:

11. Transfer and Sharing of Personal Data with Third Parties

For the purpose of sending invitations to the study, name and address data obtained from the Digital and Population Data Services Agency may be processed by parties authorised by the data controllers (for example a printing house) insofar as is necessary for mailing the invitations.

For the organisation of participants' travel, accommodation and catering, the name and contact details and information on diets and special needs collected in connection with the study may be processed by the parties responsible for the practical arrangements of the Citizens' Assembly, insofar as this is necessary for the arrangements. For the organisation of small-group work during the Citizens' Assembly, participants' names and contact details collected in connection with the study may also be processed by service providers responsible for facilitation.

For the payment of the Citizens' Assembly participation fees, the names and email addresses collected in connection with the study may be processed by the units responsible for payroll in the controller organisation, insofar as is necessary for paying the fees.

Recordings of the discussions, which contain participants' voices and possibly facial images, may be disclosed to an external party for transcription for research purposes. Transcription means the conversion of spoken material into written text.

Electronic survey responses are collected using the Qualtrics survey tool, where the data is temporarily stored during the survey. Qualtrics does not participate in the analysis of the data.

All of the above-mentioned parties are required to treat personal data with absolute confidentiality and responsibility and to comply with data protection principles.

12. Transfer of Personal Data Outside the EU or EEA

Personal data is not transferred outside the European Union or the European Economic Area.

With regard to the Qualtrics service, the contractual terms between the University of Turku and the service provider apply, and it is ensured that any possible transfer of data is based on safeguards in accordance with the GDPR. The requirements of the GDPR have been taken into account in the selection of the service.

13. Automated decision making

Personal data will not be used for automated individual decision-making or profiling.

14. Processing of Personal Data After the Study Ends

☒ The research data is deleted

☒ The research data is retained to assess the reliability of the study results:

☒ without direct identifiers ☐ with identifiers

Recordings of the discussion sessions will be destroyed after they have been transcribed, and in any case no later than one year after the end of the research project. Anonymised transcripts of the discussions will be stored on the Seafile server provided by the University of Turku for five (5) years after the end date of the research project.

☒ The research data will be retained for compatible scientific research in the future in accordance with the requirements of the GDPR:

☒ without direct identifiers ☐ with identifiers

The survey data will be stored on the Seafile server provided by the University of Turku for the duration of the research project, after which it will be anonymised and archived in the Finnish Social Science Data Archive and research repository Zenodo in accordance with the principles of open science.

The retention of the research data is based on Article 5(1)(b) and (e) of the GDPR. A new privacy notice will be sent to participants for the new use of the research data, unless the data controller can no longer identify the participants from the research data.

15. Rights of the Data Subject and Exceptions to These Rights

For more information about your rights under the GDPR, contact the person mentioned in section 1.

Rights of the Data Subject

According to the Data Protection Regulation, the data subject has the right to:

- Access their data (Article 15)
- Rectify their data (Article 16)
- Erase their data and be forgotten (Article 17)
- Restrict the processing of their data (Article 18)
- Transfer their data from one controller to another (Article 20)
- Object to the processing of their data (Article 21)
- Not be subject to automated decision-making (Article 22)

However, the data subject cannot exercise all rights in all situations, depending on the legal basis for the processing of personal data.

Exceptions to Data Subject Rights

Data protection legislation allows for exceptions to data subject rights when personal data is processed for scientific research and exercising the rights would prevent or significantly hinder the achievement of the research purposes. The need to make exceptions to data subject rights is always assessed on a case-by-case basis.
In this privacy notice, it is likely necessary to make exceptions to the following data subject rights:

☐ Right to access data (Article 15)
☐ Right to rectify data (Article 16))
☐ Right to erase data and be forgotten (Article 17)
☐ Right to restrict data processing (Article 18)
☐ Right to object to data processing (Article 21)

If the processing of personal data in research does not require the identification of the data subject and the controller cannot identify the data subject, the rights to access, rectify, erase, restrict processing, notify, and transfer data do not apply unless the data subject provides additional information enabling reliable identification (Article 11).

Right to Complain

You have the right to lodge a complaint with the Data Protection Ombudsman if you believe that your personal data has been processed in breach of applicable data protection legislation.

Contact Information for the Data Protection Ombudsman:
Data Protection Ombudsman's Office
Visiting address: Lintulahdenkuja 4, 00530 Helsinki
Postal address: PO Box 800, 00531 Helsinki
Switchboard: +358 29 566 6700
Email: tietosuoja(at)om.fi