



**Date: 22.4.2025**

## **Data protection statement of the research project DWELL DAILY**

You are taking part in a scientific study conducted at the University of Turku. This notice describes how your personal data will be processed in the study.

### **1. Data Controller**

University of Turku

### **2. Description of the study and the purposes of processing personal data**

Peer victimization (i.e., being the target of aggression or bullying by peers) has serious, negative effects on youth. Recent studies highlight rumination (excessively dwelling on one's distress) as a key factor in prolonged suffering for victimized youth. Despite the belief that seeking social support is beneficial, supportive friendships, surprisingly, often leads to worse adjustment for victimized youth. This project examines co-rumination (excessively discussing distress with a friend) as an explanation for this paradox. Using various methods (e.g., longitudinal studies, social network analysis, daily diary), I will investigate individual differences in the effects of victimization and (co-)rumination on mental health over different timeframes. This project aims to offer insights to parents, educators, and clinicians by identifying the youth most susceptible to the adverse effects of victimization, and highlighting healthy strategies for seeking social support.

To this end, for DWELL DAILY, students will daily report on any experienced stressors (such as being victimized), positive and negative mood, and the extent to which they ruminated on their stressor and/or talked about their stressor with friend(s) and/or parent/guardian(s) during a three-week period. The collective answers of all students taking part in these surveys will be analysed simultaneously.

### **3. Principal investigator or research group**

Name: Sarah Malamut  
Address: 20014 University of Turku  
Tel.: 0405188092  
E-mail: [sarah.malamut@utu.fi](mailto:sarah.malamut@utu.fi)

### **4. Contact details of the Data Protection Officer**

The Data Protection Officer of the University of Turku is available at contact address: [dpo@utu.fi](mailto:dpo@utu.fi).

### **5. Persons processing personal data in the study**

Sarah Malamut  
Other specified members of the research group (limited access)

### **6. Name, nature and duration of the study**

Name of the study: DWELL - Dwelling alone or together: An integrated framework of peer victimization, (co-)rumination, and mental health



**Date: 22.4.2025**

Nature of the study: Students of the participating schools will answer questionnaires 3 times during one school year (DWELL SURVEY). A subsample will participate in a daily diary for 3 weeks (school-days only; DWELL DAILY).

Duration of the study: Data collection for DWELL DAILY will occur across 3 weeks; data analysis and processing will occur for up to 5 years after data collection.

## **7. Lawful basis of processing**

Personal data is processed on the following basis, which is based on Article 6(1) of the General Data Protection Regulation:

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

## **8. Personal data included in the research materials**

Personal data collected include names and dates of birth of the students, child's native language and other languages spoken in the family, names and e-mail addresses of the parents/caretakers, and names of the teachers. In addition, data on students' peer relationships will be collected. This data is processed only using pseudonymous student ID numbers, and names are kept separate from the data. The ID key that links names to the research data is never visible to the researchers.

Names of the students or other personal information will not be stored in the data; instead, they will be stored on a separate secure network drive of the University of Turku and destroyed after the project has ended. Participants can also demand for their personal data to be deleted (from the separate secure network drive) before the end of the data collection. Only the principal investigators have access to the data.

All data will be pseudonymized during the project. The metadata and/or data that can be anonymized or masked will be archived. Research data will be stored according to the regulations of the GDPR and the Personal Data Act and finally archived in a completely anonymous format in the most suitable repository available after the completion of the project (e.g., the Finnish Social Science Data Archive: <http://www.fsd.uta.fi/en/>).

As a thank you for considering participation to DWELL DAILY, each student whose parent/guardian has filled the research consent form will be entered into a draw to win an iPad. Students whose guardians have denied the consent of their child from participating in the study will also be entered into the draw. Students participating in DWELL DAILY will also be entered into a draw to win a Smartwatch. The prizes are taxable income, and the University of Turku must report the winners' information to the Income Register. The winners' guardians will be contacted via email and asked



**Date: 22.4.2025**

for their consent to disclose the information and the child's full name, address and personal identification number. This information will be kept separate from the research data and will not be used for any purpose other than mailing the prize to the winner and filing a tax return.

## **9. Sensitive personal data**

Following categories of sensitive personal data will be processed in the study:

In the parental consent forms, personal data concerning the child's native language and other languages spoken in the family, as well as information about child's special needs are asked.

Sensitive personal data is processed on the following basis, which is based on Article 9(2) of the General Data Protection Regulation:

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

## **10. Sources of personal data**

We will ask the names of students from schools, which are anonymized to a student-ID. We ask students to fill in their date of birth. These data will not be stored together with research data and this data will be erased after the project has ended.

The raffle prize winners' guardians will be contacted via email and asked for their consent to disclose the information and the child's full name, address and personal identification number.

## **11. Transfer and disclosure of the personal data to third parties**

The personal data will be transferred to the following recipients outside the University of Turku/research group/researcher:

All data is stored in the secure servers or secure network drives of the University of Turku. Processor of the personal data in the data collection tool: Anders Innovations Oy. The roles of the controller (UTU) and processor (Anders Innovations) are defined in the contract between the two parties.

Data will be transferred to the server of Avicenna, the app that will be used for data collection in DWELL DAILY. This will be transferred through internet, encrypted via SSL/TLS, which has an A+ Qualys score. The ASVS Level is 2. These (ASVS, SSL, and Credentials) requirements apply continuously, for as long as the software is used. The Processor shall actively ensure that vulnerabilities are remedied within a reasonable period.

The raffle prize winners' information will be reported to the Income Register as required by law.

## **12. Transfer or disclosure of personal data to countries outside the EU/European Economic Area**



**Date: 22.4.2025**

Personal data will be transferred to following countries outside the EU/ European Economic Area:  
Canada

Transfer outside the EU/ European Economic Area is executed with following procedure:

- ☒ Transfer is directed to a country that is approved by EU Commission as having and adequate level of data protection.
- ☒ Transfer is done by using the Standard Contractual Clauses (SCC) approved by the EU Commission.
- ☐ Other means:

### **13. Automated decisions**

No automated decisions are made.

### **14. Safeguards to protect the personal data**

- ☒ The data is confidential.
- ☒ Personal data processed in IT systems: These are secured with passwords.

Personal information containing direct identifiers (names) are stored in the secure, password protected Wellu data collection tool located in the secure servers of the University of Turku and research data in the secure, access controlled and encrypted network drives of the University of Turku. Only limited members of the research team have access to personal data, and access is controlled by the Data Controller of the project. School admins of the participating schools can see the name lists of the students of their own school.

Processing of direct identifiers:

- ☒ Direct identifiers will be removed in the analysis phase

### **15. Processing of personal data after the completion of the study**

Duration of the processing of personal data: The metadata and/or data will be archived without personal information in accordance with FAIR data principles. Personal data is stored for up to 20 years after the end of the funding period. Until that, the necessity to store personal data is assessed every 5 years. The data will be securely disposed if in assessment there are no plans to conduct relevant further research. Participants have a right to ask for erasure of their personal data (name and date of birth) from the secure network drive of the University of Turku at any time.

The research material will be archived:

- ☒ without identifiers
- ☐ with identifiers

After the project, the data and metadata that can be opened will be archived in a suitable data archive (such as the Finnish Social Science Data Archive <http://www.fsd.uta.fi/en/>). All personal information will be masked (e.g., ID codes changed) or deleted so that the archived version will no longer be retraceable because the id-key (for the archived version) has been destroyed. The data will then be made available for subsequent use by other researchers. The permission for such use can be given by the PI (Malamut).

### **16. Your rights as a data subject, and exceptions to these rights**

Contact information: [DPO@utu.fi](mailto:DPO@utu.fi)

**University of Turku**  
FI-20014 University of Turku, Finland  
Telephone +358 29 450 5000



**Date: 22.4.2025**

## **Exceptions to data subject rights**

Under the General Data Protection Regulation and the Finnish Data Protection Act, certain exceptions to the rights of data subjects can be made when personal data is processed in scientific research and fulfilling the rights would render impossible or seriously impair the achievement of the objectives of the processing (in this case, scientific research).

The need to make exceptions to the rights of data subjects will always be assessed on a case by case basis. It is likely that exceptions to the following rights will be necessary in this study:

- ☒ Right of access (GDPR Article 15)
- ☐ Right to rectification (GDPR Article 16)
- ☒ Right to erasure (GDPR Article 17)
- ☐ Right to restriction of processing (GDPR Article 18)
- ☐ Right to data portability (GDPR Article 20)
- ☐ Right to object (GDPR Article 21)

Reasons and the extent for the exceptions:

Participants have a right to ask for access of their personal data. However, an exception exists in respect to data regarding their received nominations on the peer nomination items, as this would jeopardise the privacy and anonymity of the answers of their classmates.

Participants have a right to ask for erasure of their personal data. However, other research data (questionnaire data) gathered up until the request will be stored anonymously based on Scientific research based on the public interest as the legal basis for the processing of personal data, if disposing these anonymous research data would jeopardise the aims of the project. This will be assessed case by case.

## **Right to lodge a complaint**

You have the right to lodge a complaint with the Data Protection Officer if you think your personal data has been processed in violation of applicable data protection laws.

Contact details: The Data Protection Officer of the University of Turku is available at contact address [dpo@utu.fi](mailto:dpo@utu.fi)