



Date: 21.8.2025

Data protection statement of the research project TOGETHER

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. TOGETHER is part of the larger project DWELL, which combines a longitudinal study (DWELL SURVEY), a daily diary design (DWELL DAILY, and an observation study between two friends (TOGETHER). The overall goal of DWELL is to investigate individual differences in the effects of victimization and (co-)rumination on mental health. 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. In particular, TOGETHER provides unique information on how friends actually discuss problems with one another in the moment (e.g., co-rumination, problem-solving strategies, or other forms of social emotion regulation) by using an observation study. By linking TOGETHER with the longitudinal data, this will also allow examination of how characteristics of both the individual and their relationship with friend(s) impact how they discuss problems together in the moment. 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.

Towards this aim, participants will take part in a study in which they talk with a friend about a recent problem or stressor during a one-time 30-40 minute session. This conversation will be coded for different types of coping strategies. Participants will also individually answer a brief (~5 minute) questionnaire before and after the conversation. The collective data of all students taking part in the observation study and completing the surveys will be analysed simultaneously.

3. Principal investigator or research group

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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.

5. Persons processing personal data in the study

Sarah Malamut
Other specified members of the research group (limited access, will be recruited)



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6. Name, nature and duration of the study

Name of the study: TOGETHER [DWELLING TOGETHER: How to friends discuss problems with one another?]

Nature of the study: Observation study examining how friends discuss problems with one another and which social emotion regulation strategies are helpful vs. hurtful. Part of a larger project DWELL [Dwelling alone or together: An integrated framework of peer victimization, (co-)rumination, and mental health] that examines how victimization, (co-)rumination and mental health co-develop, as well as when and why their associations differ between individuals.

Duration of the study: Data collection for TOGETHER will occur across from January 2026 to May 2026; any students who consent to take part in the TOGETHER study will only participate in this substudy once. 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

- Students' names (collected as part of the larger DWELL project)
- Students' birthdays (collected as part of the larger DWELL project)
- Students' native language (collected as part of the larger DWELL project)
- Names & e-mail addresses of parents/caregivers (collected as part of the larger DWELL project)
- Names of teachers & school/class information (collected as part of the larger DWELL project)
- Video recordings of conversations between friends (collected directly in TOGETHER)

9. Sensitive personal data

There will not be any sensitive personal data collected in TOGETHER.

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



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this data will be erased after the project has ended. Personal data will also arise from the recordings of the observation task, and this data will be erased immediately after (non-identifying) transcription and coding.

The research data is gathered directly from the research participants in a questionnaire and via an observation study.

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.

Processors of the personal data in the data collection: Anders Innovations Oy (for the questionnaire portion), (UTU)Zoom and/or Microsoft Teams (observation study) & FaceReader Noldus (observation study). The use of (UTU)Zoom and/or Microsoft Teams will depend on 1) how each works with FaceReader software and 2) which software the participants are familiar with. In consultation with UTU information security experts, both (UTU)Zoom and Microsoft Teams have been deemed secure options.

The roles of UTU (the controller) and Anders Innovations OY (processor) have a data processing agreement, and the software (Wellu) runs partially with UTU servers. The roles of UTU (the controller) and the other processors ((UTU)Zoom, Microsoft Teams, FaceReader Noldus) will be defined in the contract between the two parties, respectively.

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

Personal data will not be transferred outside the EU/ European Economic Area.

13. Safety measures

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

14. Processing of personal data after the completion of the study



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Duration of the processing of personal data: Personal data is stored for 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 re-search, and at the latest after 20 years. The research data will be anonymized and archived. Regarding personal data obtained from the video recordings, these recordings will be destroyed immediately after all transcriptions and coding (with all identifying information redacted) have been completed.

The research material will be archived:

- without identifiers
 with identifiers

Where will the material be archived and for how long: 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/>). It will be made available for subsequent use by other researchers. The permission for such use can be given by the PI (Malamut).

15. Your rights as a data subject, and exceptions to these rights

Contact information: DPO@utu.fi

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 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