

Register	ForAc research project's privacy notice for general interview data in Sweden
Data Controller	University of Turku 20014, Turun yliopisto kirjaamo@utu.fi +358 29 450 5000
Contact details of the data protection officer	Data Protection Officer University of Turku dpo@utu.fi
Contact details of the principal investigator	Mikael Mattlin, ForAc project Arkadiankatu 23 B 00100 Helsinki mikael.mattlin@utu.fi Tel.: +358 50 326 4253
Nature and duration of the study	Research interviews are organised to gain insights of foreign company acquisitions in Sweden and Sweden's process of reforming its foreign direct investment (FDI) screening. The focus is on Chinese acquisitions and the particular questions that China's economic engagement may bring on in FDI screening processes. The interviewees are persons with special knowledge of the above-mentioned themes.
	The interviews form a part of the research project "Foreign acquisitions and political retaliation as threats to supply security in an era of strategic decoupling" (ForAc) of the University of Turku, funded by the Academy of Finland. ForAc started in August 2020 and it will end in November 2023. ForAc organises and conducts the interviews together with Nationellt kunskapscentrum om Kina (NKK) during the timespan of the ForAc project. This privacy notice can be found on ForAc website (https://sites.utu.fi/forac/fi/gdpr/). In addition, it is e-mailed to all interviewees or given in person.
	The interviews are conducted either face-to- face, on an online communication platform



(e.g Teams/Zoom) or by phone.

The interviewees are provided with a list of questions before the interview. Yet the interview is semi-structured, meaning that there is also space for open discussion. It lasts 45-90 minutes. By participating in this research interview, interviewees can support research on small open economies' supply security and crisis preparedness.

The results will be published in UI Brief series (policy relevant briefing notes published by Utrikespolitiska institutet) and academic articles. They may also be reported or referred in part in other reports and popular articles as well as in conference, seminar and workshop presentations and papers.

# Persons processing personal data in the study and their roles

The interviews are part of the ForAc project of the University of Turku. The principal investigator of the project is Mikael Mattlin. He is responsible for the overall research project and its scientific progress, including these research interviews.

The interviews are conducted by senior researcher Liisa Kauppila (liisa.kauppila@utu.fi, +358443110034) and analyst Björn Cappelin. (bjorn.cappelin@ui.se). Kauppila and Cappelin are also responsible for analysing the interview data. ForAc research assistant Ines Söderström has the access to data, and she e.g. transcribes data and makes practical arrangements etc.

In addition, senior researcher Oscar Almén (Totalförsvarets forskningsinstitut, FOI) has the access to the data if that is necessary when coauthoring publications with ForAc researchers.

Based on the interviewee's preference, interviews are either recorded or notes are taken by hand. If the interview is conducted



	on an online platform, only the voice is recorded. After that, the recorded files are transcribed mainly with NVivo software. Hand-written notes are transcribed with Microsoft Word.  Transcribed files are pseudonymised, that is, direct identifiers are deleted. It is, however, possible to link the pseudonymised files to personal data with codes.
Purpose of processing personal data and lawful basis of processing	Personal data is processed for producing scientific knowledge in order to perform a task carried out in the public interest (scientific or historical research purposes or statistical purposes) (Article 6(1) of the General Data Protection Regulation).
Personal data included in the research materials	<ul> <li>Name</li> <li>Title</li> <li>Organisation</li> <li>E-mail</li> <li>Phone number</li> </ul> It is also possible that an interviewee chooses to share other types of personal data or information that, taken together, leads to her/him – even if no single answer contains personal data.
Sources of personal data	Personal data is gained from  ForAc's existing sources (e.g. networks of researchers at NKK and elsewhere)  Public domains (e.g. webpages of organisations etc.)  Interviewees themselves
Transfer and disclosure of the personal data to third parties	Interview data (including personal data) will be transferred to following recipients outside the University of Turku/ForAC research group:



#### 1) NKK

A contract about handling personal data is made with the data controller (University of Turku) and NKK.

#### 2) FOI

In case FOI researcher Almén processes interview data (with personal data) when coauthoring publications with ForAc researchers, a contract about handling personal data will be made with the data controller (University of Turku) and FOI.

Only ForAc research team members involved in the interview process, as well as Cappelin and Almén, have the access to interview data with direct identifiers. Pseudonymised interview data can be accessed and analysed by other Finnish ForAc research team members.

ForAc is also conducting other types of research interviews in Sweden and Finland. This privacy notice only applies to interviews that meet the specific purpose outlined in section "nature and duration of the study" of this document. Other types of interview data may be processed by additional persons not mentioned here, but they do not have the access to the general interview data covered by this notice.

Should it become relevant for purposes of research transparency and reliability to identify a research subject position or organisation in published research reports, e.g when quoting an expert interview, use of the quotation and the reference to the interviewee will be cleared with the interviewee prior to publication, in addition to informed consent.

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.



Automated decisions	No automated decisions will be made.
Duration of processing personal data	Personal data are removed when the information is no longer needed. At the latest, this will be done one year after the project has ended.
Processing of personal data after the completion of the study	The interview data will be archived without identifiers on a University of Turku server secured by passwords. It will be stored up to five years from the completion of the project
	A year after the completion of the project, interview metadata (a descriptive record of the data-gathering process and its content) will, however, be made available to a wider research community as part of ForAc's overall data set in the spirit of open science.
	The metadata will be described by using a tool described for this purpose (e.g. Qvain, (fairdata.fi/en/qvain/) and saved to a database of research materials and metadata (e.g. Etsin, fairdata.fi/en/etsin).
Safeguards to protect the personal data	Interview data (with personal identifiers) is stored according to best practices, good information security and current legislation on username and password-protected computers of ForAc team members mentioned in this notice, Cappelin and, if need be, Almén. Hand-written notes are stored in a locked compartment.
	Direct identifiers will be removed when the data is analysed.
	Once the interview data has been processed with NVivo, the data will be saved on University of Turku's Seafile cloud service. The access requires a username and two passwords. Also the other Finnish members of the ForAc team have the access to this cloud service.
	Seafile creates a log that is used for managing information security, technical development and noticing, preventing, and solving



	systemic errors (Tietoyhteiskuntakaari (917/2014) 138§, 141§, 144§, 272§). The logs are stored for these purposes as long as it is necessary, but they are not used for any other purpose.
Your rights as a data subject and exceptions to these rights	You have the right to 1) ask for an access to your personal data, 2) have your details corrected, and 3) limit or entirely refuse their processing (right of access/GDPR Article 15, right to rectification/GDPR Article 1, right to erasure/GDPR Article 17, right to restriction of processing/GDPR Article 18, right to data portability/GDPR Article 20 and right to object/GDPR Article 21).  For more details, contact the data protection
	officer of the University of Turku.  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 not likely that such exceptions will be made in this interview study.
Right to lodge a complaint	You have the right to lodge a complaint with the data protection ombudsman if you think your personal data has been processed in violation of applicable data protection laws.  Contact details:  Office of the Data Protection Ombudsman Lintulahdenkuja 4, 00530 Helsinki P.O. Box 800, 00531 Helsinki, Finland E-mail: tietosuoja(at)om.fi Switchboard: +358 (0)29 566 6700