



Ministry of Education and Culture Privacy Notice to Data Subjects

Personal data processed in a sample selected for a two-year pre-primary education trial

1 General information

This privacy notice contains the information to be provided for the data subject (a natural person) required under Articles 13 and 14 of the EU General Data Protection Regulation (EU) 679/2016. Data subjects are provided with this privacy notice when personal data is collected.

The first version of this Privacy Notice is dated 17 February 2021. Since then, the privacy notice has been modified as follows:

- 11 November 2024: the wording of sections 4, 6 and 8 was made more concise, and information on archiving the data was added to section 10.

2 Name and contact details of the controller

Ministry of Education and Culture
Street address of the Registry: Ritarikatu 2 b, Helsinki
Postal address: P.O. Box 29 FI-00023 GOVERNMENT
Email: kirjaamo.okm@gov.fi
tel. +358 295 16001 (Government switchboard)

3 Contact details of the data protection officer

Data Protection Officer at the Ministry of Education and Culture
Email: okmtietosuojavastaava@gov.fi
Postal address: Ministry of Education and Culture, P.O.Box 29, FI-00023
GOVERNMENT.

4 Purposes of processing personal data

- Carrying out random sampling for the two-year pre-primary education trial (register data)
- Improving the reliability of statistical research methods
- Making it possible to extract generalised research results from the sampling
- Supporting political decision-making and promoting educational rights



- Processing for research, history and statistical purposes

5 Basis for processing personal data

- Government Rules of Procedure (262/2003)
- Government Decree on the Ministry of Education and Culture (310/2010)
- Act on a Two-Year Pre-primary Education Trial (1046/2020)
- Archives Act (831/1994)

The legal basis for personal data processing is provided in accordance with Article 6(1)(c) of the General Data Protection Regulation (compliance with statutory obligations).

6 Categories of data subjects and categories of personal data to be processed

Categories of data subjects:

- Children born between 1 January 2014 and 31 December 2017 living in mainland Finland
- Children's parents and other guardians living in the same household

Personal data groups:

- Data of the Digital and Population Data Services Agency: Personal identity code, gender, mother tongue, name, nationality, permanent address, address coordinates, address history, municipality of residence (municipality code and name), region, municipality of birth, information on parents or other guardians or parenthood information
- Tax Administration data: Tax data of the children's parents or of other guardians living in the same household
- Data produced by Statistics Finland: Data on the level of education of the children's parents or of other guardians living in the same household
- Data of the Finnish National Agency for Education and data of the municipalities taking part in the trial: Unit location information on early childhood education and care, pre-primary education and participation in year 1 of primary school for 2018 to 2020

Combination data formed using the data cited above, on the basis of which, with the help of location data and background data needed for sampling, children have been assigned to units taking part in the trial.

7 Sources for personal data when unavailable from the person concerned

- Digital and Population Data Services Agency
- Finnish Tax Administration



- Statistics Finland
- Finnish National Agency for Education
- The municipalities taking part in the trial

8 Processors and recipients of personal data

Processors of personal data:

- Aalto University
- VATT Institute for Economic Research
- CSC - IT Center for Science Ltd
- The municipalities taking part in the trial

Recipients of personal data:

- The municipalities taking part in the trial (children's name, personal identity code, address, test group or control group data)

9 Transferring personal data outside the EU or the EEA or to international organisations

No personal data is transferred outside the EU or the EEA or to any international organisations.

10 Personal data retention periods

Under the Act on a Two-year Pre-primary Education Trial, the data sample will be retained for a fixed period until sampling has been completed for children born in 2017.

After the end of the retention period laid down in the Act on a Two-year Pre-primary Education Trial, the research data will be archived based on a screening decision made by the National Archives of Finland.

11 Data subject's rights

Data subjects have the right to be informed by the controller of whether or not their personal data is processed.

Data subjects also have the right to request from the controller:

- access to personal data pertaining to themselves
- correction or erasure of personal data which is inaccurate or out of date
- restriction of the processing of personal data.

Data subjects who believe that their personal data is not being processed on a lawful basis have the right to lodge a complaint with the Data Protection Ombudsman.



12 Automatic decision-making and profiling

The personal data is not used for automated decision-making or profiling that would have an effect on the data subjects' rights or freedoms.

13 Protection of personal data

In its capacity as the controller, the Ministry of Education and Culture has taken the necessary technical and organisational measures to ensure that the data is secure and also requires this of the processors of personal data.