PRIVACY NOTICE

Together Towards Accessibility - Inclusion of Foreign-Language Speakers in Social and Health Care Services

Processing of personal data in project activities and evaluation

Project code	S32090
Implementation period	1.9.2026–31.1.2029
HAMK's role	Co-implementer in a group project

Purposes of processing personal data

You are participating in the Together Towards Accessibility - Inclusion of Foreign-Language Speakers in Social and Health Care Services project. The project is a group project funded by the European Social Fund Plus (ESF+). Seinäjoki University of Applied Sciences (SEAMK) is the lead implementer, and Häme University of Applied Sciences (HAMK) is a co-implementer.

This privacy notice explains what personal data are processed in HAMK's part of the project, where the data are obtained, the purposes for which they are used, how long they are retained, and what rights data subjects have.

The project aims to increase the inclusion of adult foreign-language-speaking clients in the development of social and health care services, improve the accessibility of services through multilingual, plain-language and digital solutions, and strengthen professionals' language-aware and culturally aware competence. HAMK's activities focus particularly on the Kanta-Häme region in cooperation with the Wellbeing Services County of Kanta-Häme and other partners.

Personal data are processed for the following purposes:

- contacting and inviting participants and registering them for project activities;
- organising development groups, client panels, workshops, training, pilots and other events;

- monitoring and evaluating participation, feedback, experiences of inclusion and the impact of the project;
- co-developing and user-testing multilingual and accessible service, communication and feedback solutions;
- monitoring, reporting and documentation required by law and by the funder; and
- reporting, publishing, communicating and disseminating project results in a way that does not identify an individual participant without their separate consent.

Participation in the project is voluntary. Refusing to participate or discontinuing participation will not have any adverse consequences. Data that have already been anonymised can no longer be linked to an individual participant and therefore cannot be deleted at the participant's request.

This is a one-off study.

Contact person for matters related to the register

The group project is implemented by Seinäjoki University of Applied Sciences and Häme University of Applied Sciences. This notice concerns the processing of personal data in HAMK's part of the project.

Director responsible for the project

Suvi Tuomi, suvi.tuomi@seamk.fi, tel. +358 40 830 031
Seinäjoki University of Applied Sciences

Project contact person at HAMK

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Experts from both universities of applied sciences who are involved in the project participate in data collection and processing, reporting of results and project implementation.

At HAMK, the project experts and the experts employed by the project who collect data in the Oma Häme region are:

- Taru Arknil, Senior Lecturer in Social Services;
- Oona Ojantausta, Senior Lecturer in Health Care; and
- Tiina Lehto-Lundén, Principal Research Scientist.

Legal basis for processing

The processing of personal data related to voluntary participation in the project and to feedback, interview, survey and development data collected from participants is based on the data subject's consent (Article 6(1)(a) of the EU General Data Protection Regulation).

The data subject has the right to withdraw consent at any time. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal of consent.

Personal data content and retention periods of the register

The data processed depend on the project activity in which the person participates.

The project may process the following data:

- name, gender and contact details, such as email address and telephone number;
- bank details and other personal data required for the payment of fees to experts by experience
- participation data, such as registration, attendance, event and time of participation;
- professional and organisational data, such as job title, occupational group, organisation and language information;
- language background needed for service provision and the need for interpretation or translation support;
- feedback, survey responses, interview and workshop materials, development proposals, and descriptions of service experiences and barriers to accessibility;
- responses describing experiences of inclusion and trust, including data collected using the Finnish Institute for Health and Welfare (THL) Experiences of Social Inclusion Scale;
- data on participation in training, competence needs and self-assessment of competence;
- feedback data generated through pilots, user testing and the use of multilingual feedback channels;
- participant and monitoring data required by the funder and entered into the EURA system in accordance with separate information provided; and
- photographs, audio recordings or video recordings only when participants have been informed of the recording in advance and there is an appropriate basis for it.

The project does not process sensitive personal data. Direct identifiers are removed from or separated from the material to be analysed as early as possible.

Data are retained only for as long as necessary for project implementation, evaluation and reporting, for enabling participants to exercise their rights, and for meeting the funder's obligations:

- contact details and registration data: for the duration needed to organise project activities and thereafter only for the necessary administrative period;
- consent documents: at least for the duration of the processing of personal data and for the retention period confirmed by the organisation;
- interview, survey, workshop, feedback and evaluation materials: for the duration of project implementation, analysis and reporting, and for a separately confirmed period after the end of the project; and
- participant and monitoring data required by the funder: for the period specified in the funding decision, legislation and the funder's instructions.

After the project, the materials will be archived without identifying information and retained for five years, until January 2035, after which they will be destroyed.

Participation consent forms will be retained until the end of the project in a closed HAMK file storage location accessible to the person responsible for the project.

Data subjects

Personal data may be processed concerning the following groups participating in project activities:

- adult foreign-language-speaking clients of social and health care services in the Wellbeing Services County of Kanta-Häme, including development clients and members of development groups and client panels;
- persons participating in open development workshops, user testing, interviews, surveys and other evaluation activities;
- social and health care professionals and persons participating in training;
- representatives of wellbeing services counties, municipalities, employment services, organisations, associations, immigrant communities and other cooperation networks; and
- experts participating in project implementation.

Data sources

Data are obtained from the data subjects themselves in connection with registration, surveys, interviews, workshops, development groups, client panels, training, pilots and the provision of feedback.

Contact details may also be obtained from project partners or from organisations' public websites when a person is contacted on the basis of their work duties or cooperation role.

Recipients of personal data

Personal data are processed only by HAMK project employees and other persons expressly authorised for the task who need to process the data in order to perform their work duties. HAMK-approved information and communication systems and survey, registration, storage and online meeting services may be used in the processing of personal data.

The recipients of personal data are Microsoft Oy and Webropol Oy.

Principles of protection

Data are stored in information systems (Microsoft Teams and Webropol) for which the project experts have personal user IDs and passwords. Access to and use of data in the systems are limited to controllers and persons who need them for their work. The lawful processing of personal data is ensured through data classification and procedures that comply with the rules for handling data materials.

Users log in to the systems using personal user IDs and passwords and the strong authentication required by the organisation.

Contact details, such as email addresses or telephone numbers, are stored only in the electronic survey system (Webropol).

Participants may describe information concerning their health or functional capacity even though such information is not specifically requested. If the material contains health data or other special categories of personal data, their processing will be limited to the minimum necessary for carrying out the study. Unnecessary special-category personal data will be deleted or anonymised as early as possible during the processing of the material.

During analysis, direct identifiers and strong indirect identifiers are removed. The material may retain indirect identifiers relating, for example, to the department in which a participant works and the participant's work duties.

Aggregated or anonymised data are used in reports and publications. Direct quotations are modified where necessary to reduce identifiability. Materials are securely destroyed at the end of the retention period.

Controller

Each university of applied sciences implementing the project acts as the controller for data collected in its own geographical area.

Häme University of Applied Sciences (HAMK) acts as the controller for HAMK's part of the project.

Contact details

Häme University of Applied Sciences Ltd
Telephone: +358 3 6461
Email: hamk@hamk.fi
P.O. Box 230, FI-13101 Hämeenlinna, Finland

Data protection officer

Kari Kataja
tietosuojavastaava@hamk.fi
Häme University of Applied Sciences Ltd
P.O. Box 230, FI-13101 Hämeenlinna, Finland

Automated decision-making

No automated decision-making is performed on the recorded data.

Transfer of data outside the EU or EEA

Personal data are not transferred outside the HAMK project team. Analysed material from which identifying information has been removed, meaning that the material has been anonymised, may be disclosed to the other implementer in the group project (SeAMK). Data are not transferred outside the EU or EEA.

Rights of the data subject

The EU General Data Protection Regulation (2016/679) provides the data subject with the following rights:

Right to withdraw consent

The data subject shall have the right to withdraw his or her consent at any time. Withdrawing consent does not affect the lawfulness of processing carried out before the withdrawal of consent. (Article 7)

Right of access by the data subject

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed. The data subject shall have the right to access to the personal data concerning him or her. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the data controller may charge a fee or refuse to act on the request. (Article 12 and Article 15)

Right to rectification

The data subject shall have the right to obtain from the data controller the rectification of inaccurate personal data concerning him or her contained in the register (Article 16). A request for rectification shall be submitted in writing. Persons in an employment relationship (with HAMK or HAMI) are able to do rectification suggestions concerning their recorded working hours, which are then approved by their supervisor or salary administration personnel.

Right to erasure

The data subject shall have the right to request the erasure of personal data concerning him or her where one of the following grounds applies (Article 17):

- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing, and there are no overriding legitimate grounds for the processing (Article 21);
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Right to restriction of processing

The data subject shall have the right to obtain restriction of processing where one of the following applies (Article 18):

- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right to data portability

Where the processing is based on consent and carried out by automated means, the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a data controller, in a machine-readable format. (Article 20)

Right to lodge a complaint

The data subject shall have the right to lodge a complaint with **the Office of the Data Protection Ombudsman**. Further information: https://tietosuoja.fi/en/frontpage

Contact details

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