

Document No. T/110/2025

10 July 2025

Privacy Policy of the Administrative Review Division

1. Data controller

The Administrative Review Division operating in connection to the National Committee on Medical Research Ethics (Tukija).

Visiting address: Valvira, Ratapihantie 9, FI-00520 Helsinki

Postal address: PO Box 43, FI-00521 Helsinki

Other contact details: tel. +358 (0)295 209 111 (switchboard), info@tukija.fi

2. Contact person for the register

Outi Konttinen, outi.konttinen@tukija.fi

3. Contact details of the Data Protection Officer

Jukka Tuomela, tietosuoja@valvira.fi

4. The personal data processed

The registered data is intended for the operations of the Administrative Review Division. For the purpose of the decision issued by the Administrative Review Division, the register will process, where applicable, the following information about the persons in charge of the research project and its contact persons:

- name, date of birth and role in the research project
- address and contact information
- employer or company
- educational background
- professional information (work experience, publications) and other information provided in the CV submitted

- the name of the processor and the presenter, contact details.

5. Grounds for processing personal data

The duty of the Administrative Review Division is to process appeals against negative opinions issued by the Regional Committees on Medical Research Ethics. For this purpose, the Administrative Review Division processes the personal data presented in the appeal.

The processing of personal data is based on compliance with a legal obligation under the Article 6 (1c) of the EU General Data Protection Regulation (EU 2016/679).

Personal data is processed for the purpose of processing a claim for rectification referred to in section 22b of the Medical Research Act (488/1999) and issuing a decision.

Personal data will not be processed for any purpose other than that for which it has been collected. The Administrative Review Division will not use personal data for automated decision-making or profiling.

6. Retention period of personal data

The retention period of personal data depends on the retention period of the document containing said data:

- Administrative Review Division's minutes and record extracts, statements, decisions (retained permanently).
- Documents related to the appeal, excluding the decision (retained 10 years).

7. Regular sources of data

The Administrative Review Division will receive information from the submitters of the application for the appeal.

8. Data processors

Tukija's separate Administrative Review Division operates in connection with the National Supervisory Authority for Welfare and Health, Valvira. The data is also processed by Valvira's system administrators.

9. Disclosure of data

Data can only be disclosed and the processing of personal data outsourced in compliance with valid legislation.

The decision on the appeal will be disclosed to the Regional Committee on Medical Research Ethics whose decision was the subject of the appeal.

Data is disclosed to others only upon request in accordance with the Act on the Openness of Government Activities (621/1999) and the data protection legislation.

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

10. Rights related to the processing of personal data

This is a register required by law. In this case, the data subject has the right to:

- obtain access to personal data concerning them in accordance with Article 15 of the General Data Protection Regulation. This request is addressed to the party in section 2.
- demand the rectification of erroneous data in the register concerning them in accordance with Article 16 of the General Data Protection Regulation. This request is addressed to the party in section 2.
- request restriction of processing of personal data in accordance with Article 18 of the General Data Protection Regulation.

Due to the fact that the register is required by law, the data subject does not have the right to:

- have the data controller erase the personal data concerning the data subject without undue delay in accordance with Article 17 of the General Data Protection Regulation.
- transfer their personal data from one system to another or have their data transferred directly from one controller to another in accordance with Article 20 of the General Data Protection Regulation.

If the data subject considers that data protection legislation has been violated in the processing of personal data, the data subject has the right to lodge a complaint with the Office of the Data Protection Ombudsman.

Further information on the rights of the data subject can be found on the website of the Office of the Data Protection Ombudsman: <https://tietosuoja.fi/en/know-your-rights>

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