v1/2020

DATA PROTECTION NOTICE FOR SCIENTIFIC RESEARCH
General Data Protection Regulation of the EU
Articles 12–14
Date: October 31, 2026

Information on the processing of personal data in the research project titled *The double edge of social media influencing: Participatory antagonism and communicative resilience in the Nordics (INFLU-NORD)*

The research project entitled Influ-Nord involves processing of personal data. The purpose of this data protection notice is to provide information on the personal data to be processed, from where they are obtained and how they are used. Detailed information on the rights of data subjects will be provided at the end of this notice.

1. Data Controllers

University of Helsinki (UH)
Address: PO Box (Fabianinkatu 33), 00014 University of Helsinki, Finland

Lund University (LU)
Address: Department of Communication, Faculty of Social Sciences, P. O. Box 117, SE-221 00 Lund, Sweden

Copenhagen Business School (CBS)
Address: the Department of Management, Society and Communication, Solbjerg Plads 3, 2000 Frederiksberg, Denmark

2. Contact person and principal investigator

Contact person in matters concerning the research project:
Name: Docent Salla-Maaria Laaksonen
Faculty/department/unit: Centre for Consumer Society Research (Kuluttajatutkimuskeskus), Faculty of Social Sciences
Address: P.O. Box 16, 00014 University of Helsinki
Phone: +358 50 415 6576
Email: salla.laaksonen@helsinki.fi

3. Contact details of the data protection officer

You can contact the University of Helsinki data protection officer via email at tietosuoja@helsinki.fi.

4. Description of the research project and the purpose of processing personal data

The INFLU-NORD project has two main objectives. First, it aims to improve our understanding of the impact of new antagonistic participatory practices driven by social media influencers on the societal security and democracy of the Nordic countries. Second, it aims to develop strategies to strengthen democratic resilience and develop strategies to mitigate these emerging antagonistic practices, including by seeking ways to harness social media influencers as protagonists to support democracy. In order to understand social media influencing practices, the project collects large social media datasets originating from public social media accounts that act like social media influencers and have gained a significant number of followers.

Data will be collected and processed in accordance with GDPR requirements and social media research ethics in line with guidelines provided by AoIR and the FInnish National Board on Research Integrity. The collection and processing of data is based on the public interest in accordance with Art 6.1(e) of the GDPR. In addition, in accordance with Article 9.2e, the processing concerns personal data that the data subject has made public.

The project is conducted in collaboration with the University of Helsinki, Lund University and Copenhagen Business School. The data will be stored in accordance with the University of Helsinki's data security rules and will be accessible only to researchers working on the project in the three mentioned universities. The data will not be made available to third parties.

5. Personal data included in the research data

The project collects social media data originating from public social media accounts that act like social media influencers and have gained a significant number of followers. All the data we utilize is publicly available and visible via the browser interface for a regular user. The data records are public social media messages, including the username, nickname, time of posting, text content, any images and links attached to the message, the url of the original message, and platform-specific information on the popularity metrics of the message. In some cases the data might also include comments given by non-influencer users, but those are not in the focus of the study and will be analyzed only pseudonymized. Platforms in focus will be Instagram, TikTok and YouTube. Data will be collected from Finnish, Swedish, Danish and Norwegian influencer accounts. Accounts are located using a digital ethnography method and snowball sampling based on keywords related to polarized discussion topics and national elections, as well as following the recommendations given by the platforms.

6. Sources of personal data

Social media data will be collected using tools designed for the post-api era (Freelon, 2018):

(A) By using tools that scrape structured data directly from a website and/or
(B) by collecting qualitative example threads manually by taking prints or screenshots from a web browser

7. Sensitive personal data

The following categories of special categories of personal data (i.e. sensitive personal data) under Article 9 of the GDPR may be processed in the survey, but only if the sender has raised the issue in a public social media post. Yet, they are not the focus of our research.

☒ Racial or ethnic origin
☒ Political opinions
☒ Religious or philosophical beliefs
☐ Trade union membership
☐ Genetic data
☐ Biometric data for the purpose of uniquely identifying a natural person
☒ Health
☒ Sex life or sexual orientation of a natural person

The processing of sensitive personal data is based on Article 9(2)(j) of the General Data Protection Regulation (processing is necessary for scientific research purposes), as well as Section 6, Subsection 1, Paragraph 7 of the Finnish Data Protection Act.

Also personal data concerning criminal convictions or offences will be processed in the research project only if the sender has raised the issue in a public social media post. In this case, the processing of data concerning criminal convictions or offences is based on Section 7, Subsection 1, Paragraph 2 of the Finnish Data Protection Act (the processing of personal data concerning criminal convictions or offences or related security measures is allowed for scientific research purposes).

8. Lawful basis for processing personal data

Personal data are processed on the following basis (Article 6(1) of the GDPR):

☒ Task carried out in the public interest:
- ☒ Scientific or historical research purposes or statistical purposes
- ☐ Archiving of research material and cultural heritage material

☐ Consent by the research subject
☐ Compliance with a legal obligation to which the controller is subject
☐ Legitimate interests pursued by the controller or by a third party
Specify the legitimate interest:

If the processing of personal data is based on the research subject's consent, he or she can withdraw that consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

9. Recipients of data

The personal data collected through interviews in the study will be processed by the project researchers, who are affiliated with the project in one of the three universities. Data containing personal data will only be stored on servers operated by the respective universities and/or CSC

- IT Centre for Science in Finland.

10. Transfer of data to countries outside the European Economic Area

Data will not be transferred to countries outside the European Economic Area.

11. Automated decision-making

The research project involves no automated decision-making that has a significant effect on data subjects.

12. Protection of personal data

Personal data included in the research dataset will be processed and kept protected so that only those who need the data can access them.

The data processed in data systems will be protected using the following:
☒ Username and password
☐ Registration/log of use
☒ Access control
☒ Encryption
☒ Two-factor identification
☐ Other, please specify:

Processing direct identifiers:
☒ The controller collects the personal data without direct identifiers. (A)
☐ Direct identifiers will be removed during the analysis stage and kept separate from the analysed research data.
☒ The data will be analysed using direct identifiers, because (give grounds for preserving the direct identifiers): (B) for qualitative analysis of the data it is essential to be able to follow the events taking place on the platform, many of which are also public by nature.

The material is public data where running user identifiers are part of the original CC-licenced data dumps. The cc-by-sa 4.0 licensing requires attribution of the original content producer and the data source.

13.Duration of the processing of personal data in this research project:

Influ-Nord project runs 1.2.2026-31.12.2028, but individual sub-studies might continue beyond the final date.

14. Processing of personal data when the research project ends

☐ The research data will be deleted

☒ The research data will be kept for the purposes of validating or replicating the results of this research project:

☐ without identifiers ☒ identifiers included

☒ The research data will be kept for later, compatible scientific research in accordance with the requirements of the GDPR:

☒ without identifiers ☐ identifiers included

The storage of the research data is based on Article 5(1)(b) and (e) of the GDPR.
Before the data can be used for other research, the controller will ensure that the new use is compatible with the initial purpose in accordance with the requirements of the GDPR. Data subjects will receive a new data protection notice on the new use of the research data, unless the controller can no longer identify the subjects from the data.

In addition, the data subjects will not be informed of the new research if delivering this information to them is impossible or involves a disproportionate effort or renders impossible or seriously impairs the achievement of the research objectives (Article 14(5)(b) of the GDPR).

The data will be stored for ten years after the end of the research project using shared and secure facilities offered by CSC IT Centre for Science and/or Lund University. Access will only be provided to the researchers who were part of the original project.

15. Rights of data subjects and derogations from those rights

The contact person in matters related to research subjects' rights is the person stated in section 1 of this notice.

Rights of data subjects

Under the General Data Protection Regulation, data subjects have the following rights:

- Right of access to their data
- Right to rectification of their data
- Right to the erasure of their data and to be forgotten
- Right to the restriction of processing of their data
- Right to data portability
- Right to object to the processing of their data
- Right not to be subject to automated decision-making

However, data subjects cannot exercise all their rights in all circumstances. The circumstances are affected by, for example, the legal basis for processing personal data.

Further information on the rights of data subjects in various circumstances can be found on the website of the Data Protection Ombudsman:
https://tietosuoja.fi/en/what-rights-do-data-subjects-have-in-different-situations.

If data subjects cannot be identified

If the processing of personal data for research purposes does not require the identification of the data subject and if the controller is unable to identify the data subject, the right to access, rectify, erase and restrict the use of personal data, as well as any notification obligations and the right to data portability do not apply unless the data subject provides additional data

enabling their identification (Article 11 of the GDPR).

Derogations from rights

The General Data Protection Regulation and the Finnish Data Protection Act enable derogations from certain rights of data subjects if personal data are processed for the purposes of scientific research and the rights are likely to render impossible or seriously impair the achievement of the research purposes.

The need for derogations from the rights of data subjects will always be assessed on a case-by-case basis.

Right to appeal

If you consider that the processing of your personal data has been carried out in breach of data protection laws, you have the right to appeal to the Office of the Data Protection Ombudsman.

Contact details:

Office of the Data Protection Ombudsman
Street address: Ratapihantie 9, 6th floor, 00520 Helsinki
Postal address: PO Box 800, 00521 Helsinki
Phone (switchboard): 029 56 66700
Fax: 029 56 66735
Email: tietosuoja(at)om.fi