



ULKOPOLIITTINEN INSTITUUTTI  
UTRIKESPOLITISKA INSTITUTET

20 May 2026

**Privacy Notice for the research project "Divided and Lost? Strategies of center-right parties to challenge right-wing populism in Finland, Sweden, and Germany" at the Finnish Institute of International Affairs**

This Privacy Notice describes how the research project *DIVIDED AND LOST? Strategies of center-right parties to challenge right-wing populism in Finland, Sweden, and Germany*, carried out at the Finnish Institute of International Affairs and funded by Kone Foundation, processes personal data as part of its research activities, including the reporting of research results.

## 1 Data controller

The Data controller for the research project is:

Finnish Institute of International Affairs (FIIA)  
Arkadiankatu 23 B, 6th floor  
00100 Helsinki, Finland  
Business ID: 2062721-4

## 2 Contact information for data protection matters and submitting requests

As a Data subject, you may contact the Finnish Institute of International Affairs' registry regarding data protection matters and to submit requests by using the following contact information:

Registry of the Finnish Institute of International Affairs

Visiting address:

Finnish Institute of International Affairs  
Arkadiankatu 23 B, 6th floor  
00100 Helsinki, Finland

Opening hours: weekdays 09:00-15:00

Email address:

[kirjaamofia@fiia.fi](mailto:kirjaamofia@fiia.fi)

## 3 Data protection officer at FIIA

Email: [tietosuojavastaava@fiia.fi](mailto:tietosuojavastaava@fiia.fi)

## 4 Leading researcher in the project

Dr. Sanna Salo  
Phone number: +358 9 432 7742  
Email: [sanna.salo@fiia.fi](mailto:sanna.salo@fiia.fi)

Address: Arkadiankatu 23 B, P.O. Box 425, 00101 Helsinki Tel. +358 9 432 7700 Fax +358 9 432 7799 Email: [etunimi.sukunimi@fiia.fi](mailto:etunimi.sukunimi@fiia.fi)  
[www.fiia.fi](http://www.fiia.fi)

Additional information about the research team can be found on the research project's [website](#).

## 5 Purpose for processing personal data

The research project processes personal data collected in connection with confidential expert interviews, such as the interviewees' contact information, interview data, and any audio recordings. A more detailed description of the personal data being processed can be found in Section 7.

The purpose of processing personal data is, first, to manage and store information regarding the interviewees and interviewers in the research project, as well as information regarding the dates and locations of the interviews. This information may be used to verify information sources and to ask any additional questions.

In addition, the purpose of processing personal data is also to manage, store, and utilize the research data collected through expert interviews. The data obtained from the interviews will be used in the project to examine the internal divisions within Western European center-right parties and how these divisions influence party strategies, especially in relation to right-wing populist parties. The aim of the research project is to publish academic articles based on the research data between 2026 and 2028. In addition, members of the research team may publish additional research products during and after the project. The research data may also be used for further research compatible with this project and its research theme.

Personal data will be retained and may also be used to verify the accuracy of research results and to identify needs for further research.

Analysis and research results based on the data gathered in the research project may be published in publications in FIIA's publication series, scientific journals and other scholarly works, as well as in various publications aimed at expert audiences and the general public. In addition, research results based on the data can be discussed and communicated in the media, at scientific conferences, and at expert events.

Participation in the research project and the interview conducted as part of it is voluntary, and the interviewee may withdraw their participation at any time by notifying a member of the research team of the withdrawal via email (contact information in Section 4). Withdrawing from participation will not result in any negative consequences for the interviewee. If the interviewee believes that participating in the interview would cause them harm or put them at risk, they may choose not to attend the interview without providing prior notice. However, all research data collected prior to the interviewee's withdrawal, including interview data, will remain in the researchers' possession.

## 6 Legal basis for processing

Personal data processed in connection with the research is processed on the following legal bases:

- processing is necessary for the performance of a task carried out in the public interest (scientific research);

- the Data subject's explicit consent (recording of interviews, use and publication of the interviewee's name in research publications).

The primary legal basis for the processing of personal data in this research is scientific research in the public interest. Notwithstanding this, personal data is processed based on the Data subject's explicit consent for the recording of interviews on a separate device, as well as for the use and publication of the Data subject's name in research publications.

The interviewee's participation in the interview will not be disclosed to other parties. The interviewee will be given the opportunity to decide whether the interview is recorded on a separate device (audio recording) and whether they wish to appear in research publications under their own name or anonymously. As a general rule, interviewees and information obtained in interviews are referred to anonymously in research publications, meaning that the interviewee's identity cannot be identified. However, exceptions to this may be made based on written consent. Consent to record the interview and to use and publish the interviewee's name in research publications is requested in advance in writing via a form or by email.

The Data subject has the right to withdraw the aforementioned consents at any time and to have the personal data collected on the basis of those consents deleted. Withdrawal of consent means that the audio recordings will be deleted or the Data subject's name will not be published, provided that the publication has not been carried out or the article or text in question approved for publication prior to the withdrawal of consent.

## 7 Personal data processed

### **Basic information and contact details of the Data subject**

Name, email address, phone number, signature, position/job title, organization, time and/or place of the interview and related communications.

### **Personal data belonging to special categories**

During interviews, the Data subject's political opinions may come to light, which fall under the special categories of personal data defined in the General Data Protection Regulation.

### **Pseudonymized data**

Pseudonymized interview data stored by the Data controller (interview transcripts, written notes). The pseudonymized interview data is stored separately from data that could be used to identify the Data subject. The interview data has thus been pseudonymized, meaning it has been processed so that the personal data in the research material can no longer be linked to a specific individual without additional information. In practice, this means that personal data has been removed from the collected interview data and replaced with another unique identifier, i.e., a code key.

### **Interview recordings**

Interviews may be recorded using a separate device. Interview recordings may contain personal data provided by the interviewee, including information belonging to special categories of personal data, as well as the interviewee's voice as an audio recording. Interview recordings are stored separately from

other research data. The recordings are used during the research project to create pseudonymized written interview transcripts and to verify facts.

**Information regarding the Data subject's consent**  
Information regarding whether the Data subject has given consent to the recording of the interview on a separate device and/or whether they have consented to the use and publication of their identifying information in research publications.

## 8 Sources of personal data

Personal data is collected from the Data subject in connection with expert interviews conducted during the research project, including via a consent form, interview notes, any audio recordings and the resulting transcripts, and, if necessary, through other forms of communication. Personal data may also be collected and updated from public registers.

## 9 Recipients or groups of recipients of personal data

Personal data will not be disclosed to third parties.

## 10 Transfer of personal data to third countries

Personal data may be transferred outside the EU/EEA. When personal data is processed outside the EU/EEA, the Data controller has ensured that the data processor has committed to the EU Commission's standard contractual clauses for the processing of personal data or that another basis for the transfer is in place.

## 11 Retention period for personal data

Personal data collected in the research project will be stored only for the period and to the extent necessary for the purpose for which the personal data were originally collected or for a purpose compatible with the original purpose.

For reasons of research ethics, personal data collected during interviews will be stored by the Data controller for 5 years, after which it will be deleted. Interview recordings will be stored in a designated storage location, however, no longer than until the end of the research project, after which they will be deleted. Audio recordings on separate storage media will be deleted promptly after being uploaded to their designated location. The audio recordings will be deleted also from the separate storage media no later than the end of the study.

## 12 Protection of personal data

Any physical materials containing personal data are stored in locked facilities, to which access is restricted to designated individuals authorized to enter due to their duties. Databases containing personal data are protected by appropriate organizational and technical security measures. Access to databases, information systems, and software is granted only by using individually assigned authentication.

Personal data is processed by members of the research team and a limited number of individuals who, due to their work duties, need to process the data to carry out the research project or respond to Data subject's request. The employees of the Finnish Institute of International Affairs are committed to maintaining confidentiality and keeping secret any information they receive in connection with the processing of personal data. System providers have committed through contractual arrangements to complying with the data protection and data security requirements set forth in the General Data Protection Regulation (GDPR).

### **13 Rights of the Data subject**

The Data subject may submit a request regarding their rights, such as a request to access their data, through different channels.

The Data subject may use the form available on the Finnish Institute of International Affairs' website (<https://fiia.fi/en/privacy-statements>) to submit a request regarding the processing of their personal data. The Data subject may submit in person the carefully completed and personally signed form to the Finnish Institute of International Affairs' registry. Alternatively, the request may be sent to the registry via email using the address provided by the Data subject during the interview. If necessary, FIIA may ask the Data subject to clarify the request. For data security reasons, FIIA may also need to verify the identity of the person making the request before processing it. In such cases, FIIA may request additional information and/or ask the Data subject to verify their identity, for example, with an ID card.

The Registry of the Finnish Institute of International Affairs will forward the request to FIIA's Data protection officer. The Data protection officer is responsible for responding to requests regarding the Data subject's right of access or other rights (see below for more details). If necessary, the Data protection officer may be asked for additional information regarding the progress of the request or the content of the response.

The Data subject may collect a copy of their personal data in person from the Finnish Institute of International Affairs' registry office, where the Data subject must also verify their identity. If the original request was sent by email using the email address the Data subject previously provided during an interview and their identity has been verified, a copy of the personal data may be sent to the Data subject via that address.

More detailed contact information for submitting a request or regarding other data protection matters can be found in Section 2 of the Privacy Notice.

#### **A. Right to be informed about personal data processing and obtain access to personal data**

The Data subject has the right to obtain information regarding the processing of their personal data and to personally verify what data concerning them is being processed in connection with the research project.

Prior to expert interviews, to provide a comprehensive overview of the processing of personal data in the research project, Data subjects will be provided with descriptions of how the interviews will be conducted and what the practices related to the processing and protection of personal data are. Data subjects will also be provided with the project's Privacy Notice. In

addition, Data subjects have the right to ask further questions regarding the processing of their personal data.

## **B. Right to rectification and restriction of processing**

Data subjects have the right to request that the Data controller rectify inaccurate personal data without undue delay. Taking into account the purposes for which the data was processed, Data subjects also have the right to have incomplete personal data completed.

In certain situations, the Data subject has the right to request the restriction of the processing of personal data until the data or the legal basis for its processing has been properly verified and corrected or completed.

The Data controller has the right to restrict the Data subject's rights mentioned above if the processing is necessary for the performance of a task carried out in the public interest (Article 21(6) of the GDPR) and the conditions of Section 31 of the Data Protection Act are met.

## **C. Right to erasure**

The Data subject has the right to have their personal data erased from the research register without undue delay, provided that one of the following conditions is met:

1. the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
2. the Data subject withdraws the consent on which the processing is based, and there is no other legal basis for the processing;
3. the personal data has been processed unlawfully; or
4. the personal data must be erased for compliance with a legal obligation in European Union or Member State law to which the Data controller is subject.

The right to erasure does not apply if processing is necessary:

- a) for exercising the right of freedom of expression and information;
- b) for compliance with a legal obligation, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data controller;
- c) for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes; or
- d) for the establishment, exercise, or defense of legal claims.

## **D. Right to object to data processing**

The Data subject has the right at any time to object to the processing of their personal data on grounds relating to their particular personal situation, where the processing is based on the performance of a task carried out in the public interest. However, the Data controller has the right to restrict this right if there is a compelling legitimate ground for the processing that

overrides the interests, rights, and freedoms of the Data subject, or if the processing is necessary for the establishment, exercise or defence of legal claims, or if the conditions of Section 31 of the Data Protection Act are met.

If the objection is successful, the Data controller may no longer process the Data subject's personal data.

## **E. Right to lodge a complaint with a supervisory authority**

The Data subject has the right to lodge a complaint with a supervisory authority if the Data subject considers that the processing of personal data concerning them violates applicable data protection regulations.

A complaint may be lodged with the competent supervisory authority, in particular in the EU Member State where the Data subject has their habitual residence or place of work, or where the alleged infringement occurred, if the Data subject considers that the processing of personal data concerning them violates data protection legislation. In Finland, the supervisory authority is the Office of the Data Protection Ombudsman (contact details below). The Office of the Data Protection Ombudsman also provides further information on matters related to the processing of personal data and the rights of Data subjects.

Contact information for the Office of the Data Protection Ombudsman:

Office of the Data Protection Ombudsman  
Visiting address: Lintulahdenkuja 4, 00530 Helsinki, Finland  
Mailing address: P.O. Box 800, 00531 Helsinki, Finland

Phone (switchboard): +358 29 566 6700

Phone (registry): +358 29 566 6768

Email (registry): [tietosuoja@om.fi](mailto:tietosuoja@om.fi)

Before contacting the supervisory authority, please contact the Finnish Institute of International Affairs.

## **14 Automated decision-making and profiling**

Personal data processed in the research project will not be used for automated decision-making or profiling.

## **15 Changes to the Privacy Notice**

As the Data controller for the research project, the Finnish Institute of International Affairs continuously improves its operations and data protection practices and reserves the right to update this Privacy Notice. Where required by applicable law, FIIA will contact the Data subject to inform them of any changes or updates that have a significant impact on the Data subject.

## **16 Further Information**



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Further information about the research project is available on the research project's [website](#) or by contacting the project's leading researcher (contact details in Section 4).