

FORM A – Assessment of the prerequisites for application under the Secondary Use Act and of the controller status

Instructions

With this form, the applicant presents in a structured manner the grounds on which disclosure of the data set is applied for under section 51 c of the Secondary Use Act **to a secure processing environment other than the secure processing environment referred to in section 20.**

It is essential to describe the **special reason**, i.e. why it is not possible to process the data set in a processing environment in accordance with section 20.

This Form A (*Assessment of the prerequisites for application and of the controller status*) is a preliminary assessment; if the prerequisites are met, the applicant/controller will, in phase B (*Assessment of data protection and information security of the processing environment*), provide more detailed data protection and information security documentation.

1 Applicant information

Name: _____

Title: _____

Organisation: _____

Address: _____

Email: _____

Phone: _____

Applicant's role in the project: _____

Identifier of the data permit application (if known): _____

2 Basic information on the target processing environment

Name of the processing environment: _____

Location: Finland EU/ETA (country: _____) Outside the EU/EEA (country: _____)

Service provider (organisation): _____

Legislation applicable to the service provider / competent state:

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ver. 13.05.2026

3 Questions / preliminary assessment

A0. Do you wish your data permit to be processed also in the event that the conditions for applying for another secure processing environment are not met and a secure processing environment pursuant to section 20 of the Secondary Use Act is designated as the processing environment?

Yes No

Additional information (max. 500 characters):

A1. (BACKGROUND INFORMATION) International dimension

The international dimension is not an independent prerequisite. The assessment is based on the prerequisites of section 51 c and the justification for the non-applicability of section 20.

Does the implementation of the project involve international research cooperation or a foreign party?

Yes No

Short description (max. 500 characters):

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A2. (SPECIAL REASON / section 51 c(2)) Assessment of the section 20 option

The purpose of this section is to demonstrate whether the use of a secure processing environment referred to in section 20 of the Secondary Use Act has been assessed in the implementation of the project and whether its use is de facto possible. This concerns a preliminary assessment of the prerequisites for the exception under section 51 c.

Has the use of a Finnish secure processing environment pursuant to section 20 been assessed in the implementation of the project?

Yes No

If you selected “No”, justify why the assessment cannot be carried out (max. 500 characters):

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A3. (SPECIAL REASON / section 51 c(2)) Why is a section 20 processing environment not possible?

In this section, the actual and justified reasons are specified as to why it is not possible to process the data set in a processing environment pursuant to section 20 of the Secondary Use Act. In the assessment, attention is paid to the necessity of the exception and to whether the obstacle can be reasonably removed.

A3.1 Why is it not possible to process the data set in any secure processing environment pursuant to section 20?

Select at least one obstacle and provide a description.

- A3.1.1 Required software
- A3.1.2 Performance requirement
- A3.1.3 Specific characteristics of the data to be processed
- A3.1.4 Method of implementation of the research project
- A3.1.5 Other, what: _____

Description (max. 1,500 characters):

A3.2 Can the obstacles described in section A3.1 be reasonably removed in any section 20 environment (schedule/cost/technical implementation)?

No Yes

If you answered "Yes", describe the solution and schedule (max. 500 characters):

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A4. (BACKGROUND INFORMATION) Significance of the project

The purpose of this section is to provide Findata with background information on the scientific significance of the project in support of the overall assessment. This is not an independent legal prerequisite for the disclosure of data.

Is the project scientifically significant? Yes No

Justification (an assessment approved by the controller of the data to be disclosed, including contact details, max. 500 characters):

A5. (BACKGROUND INFORMATION) Benefits of the project

This section describes the potential societal, scientific or other benefits of the project as background information for the overall assessment. This section does not constitute an independent statutory prerequisite for granting the permit.

Does the implementation of the project result in potential benefits? Yes No

Justification (an assessment approved by the controller of the data to be disclosed, including contact details, max. 500 characters):

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A6. (section 51 c(1)(1)) Risks

The purpose of this section is to identify and describe the risks related to the disclosure and processing of the data set as part of the overall assessment under section 51 c of the Secondary Use Act. The assessment concerns in particular risks to national security and to the rights and freedoms of data subjects.

Are there risks associated with the processing of the data set to be disclosed?

- Processing involves risks to Finland's national security: Yes No
- Processing involves persons or organisations from countries subject to EU sanctions: Yes No
- The level of data protection in the processing does not meet the requirements of the General Data Protection Regulation: Yes No
- The level of information security in the processing of the data set / in the processing environment is insufficient: Yes No
- Other identified risks are associated with the data set to be disclosed under the data permit: Yes No

Concise description of the identified risks and how the risk assessment has been carried out (max. 1,500 characters):

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A7. (section 51 c(1)(2)) Link to a Finnish research organisation

The purpose of this section is to determine whether the prerequisite under section 51 c of the Secondary Use Act is met, according to which one of the participants in the project is an entity that carries out research activities in a Finnish research organisation.

Is one of the participants in the project an entity that carries out research activities in a Finnish research organisation? Yes No

If you answered “Yes”, describe which entity and in which Finnish research organisation, including contact details:

A8. Level of data protection of the data (anonymisation/pseudonymisation)

This section describes the intended level of protection of the data to be disclosed. A more detailed assessment of the data is carried out in the data permit processing procedure. Findata does not disclose data containing direct personal identifiers.

Can the data be disclosed in anonymised or pseudonymised form? Yes No

Selection: Anonymised Pseudonymised Both (partially) Neither

If you answered “No” or selected “Neither”, provide justifications (max. 500 characters):

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A9. (section 51 c(2)) Readiness to provide the required information in phase B

The purpose of this section is to ensure that the future controller of the data set is prepared to provide, via the applicant, the more detailed information and documentation required in phase B if the prerequisites of this A phase are met.

Has the future controller of the research data set expressed readiness to provide the information and attachments required in phase B (Form B)? Yes No**Contact person authorised by the controller (name, organisation, email, telephone):**

Contact person of the processing environment service provider (name, email, telephone):

4 Applicant's own conclusion (preliminary assessment)

A10. Applicant's assessment

In this section, the applicant presents their own view as to whether the prerequisites under section 51 c for applying for disclosure to another secure processing environment are met. The applicant's assessment is not binding on Findata, which will carry out an independent overall assessment in the matter.

Are the grounds met to apply for disclosure under section 51 c to another secure processing environment? Yes No Unclear (guidance needed)**Justifications (max. 1,000 characters, refer in particular to sections A2–A3 and A6):****I have reviewed the above information and certify that the information provided is correct****Date:** ____ / ____ / 202__**Applicant's signature / electronic confirmation:** _____