

# Pre-screening criteria for data permit applications

This document describes Findata's criteria for pre-screening data permit applications. We currently pre-screen all applications before the actual processing. Through this, we aim to ensure that applications contain all the necessary information and thus speed up processing.

Applicants may use these criteria when applying for a data permit or pre-screen an application that has already been submitted.

If you want to complete the application you have sent, ask us to return your application by sending an e-mail to [info@findata.fi](mailto:info@findata.fi). Enter the title of the message **Return of application** and the diary number of your application (e.g. Return of application THL / XXXX / 14.OX.00 / 202X).

Please note that:

- Due to workload, we are not able to receive the additional information by e-mail: it must be submitted in the application itself.
- Returning the application will not affect your position in the queue, applications will be processed based on the first time of arrival.
- Despite the submitted additions, the pre-screening may contact to you if there are any ambiguities.

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## 1 Applicant and data controller information

**Please note:**

- A data controller under the GDPR means an organization or individual who is the controller of the data to be generated.

**Criteria for an approved application:**

- There are no obvious errors in the reported information.
- There is no illogicality or obvious discrepancy between the reported data.

**Criteria for a returnable application:**

- Contact information is incomplete or has obvious errors.
- The data controller is unclear or illogical (e.g. an individual, even if the applicant is an organization, or a body that does not appear to be involved in the project at all).
- The applicant has applied as an individual, although the application gives the impression that it could be an organisational applicant (a person has an employment relationship with an organisation)

## 2 Billing details

**Please note:**

- Online e-invoicing is always the primary method of invoicing.
- The connection of the invoiced party to the project should be indicated in the application. If necessary, the discrepancy between the applicant and the billable party (e.g. the payer is not the applicant) can be clarified in the Additional Information section.
- There should be no illogicality or inconsistency between the billing method and the information provided (e.g. the applicant wants a paper invoice even though he has provided an e-invoicing address).

**Criteria for an approved application:**

- Billing information is provided correctly.
- There is no obvious inconsistency in the billing information with the other information provided in the application.

**Criteria for a returnable application:**

- Individual ambiguities in billing details will not result in the return of the application. However, if there are several ambiguities in the application or the overall picture remains fragmented, the application will be returned to the applicant.

**3 Purpose of data use****Please note:**

- The overall picture obtained from the application should correspond to the declared use in accordance with the Act on Secondary Use of Health and Social Data.
- The requested data should correspond to the purpose of the processing of personal data.
  - Criteria for scientific research (general level):
    - an appropriate research plan
    - principle investigator or research group
    - the results are published as scientific publications
    - research produces new information.
- A thesis is considered to be at least a thesis from a bachelor's degree.
- The reduced price of the thesis only applies to an individual thesis. If more than one thesis is carried out in the project, it is not a thesis referred to in Findata's application, but a research project. If the thesis is produced as part of a larger project or several theses are produced in the project, the normal permit decision fee will be invoiced.

**Criteria for an approved application:**

- The description of the purpose of the data use does not reveal any shortcomings, contradictions or inconsistencies.

**Criteria for a returnable application:**

- The purpose of the data use does not appear to be the same as stated.
- The information in the application is incomplete or it doesn't seem to correspond with the purpose and objectives of the data use.
- The selection as a thesis is made on the wrong grounds.

## 4 Defining the target group

**Please note:**

- The data to be extracted must be submitted in the table available on Findata's website: <https://findata.fi/en/data-permits/> **This table is a mandatory appendix to the application.**
- Data extraction is carried out in accordance with the application. **Errors in the description of the target and control group criteria significantly affect the usability of the data.**
- The formation of the target group of the application must be described clearly enough and delimited according to the intended use. Pay special attention to which registers and with what criteria the target group is extracted. For example, delimitation by area may mean place of residence, place of birth, place of work or place of use of services.
- If the target group has already been formed, the application must indicate with which data permit the target group has been formed and whether the data permit for it is still valid.

**Criteria for an approved application:**

- The target group is clearly indicated and does not raise any additional questions.

**Criteria for a returnable application:**

- It is not clear from the application how the target group will be formed or, if ready, from where it will be delivered and whether the permits are valid.

## 5 Defining control subjects and relatives

**Please note:**

- The extraction of control subjects and relatives should be clearly described. The registers from which the extraction is carried out and the criteria on the basis of which the controls and / or relatives are identified must be clarified. (The Findata table template already describes the criteria from the data of the Finnish Digital and Population Data Services Agency.)
- For control subjects, the amount to be sampled per subject and the similarity criteria should be reported as precisely as possible.
- It should be informed how relatives are identified and, if necessary, specify the relationship (e.g. biological vs. adoptive parents).

**Criteria for an approved application:**

- The conditions for control subjects and relatives are clear.

**Criteria for a returnable application:**

- The conditions for control subjects and relatives are not clear.

## 6 Requested data

**Please note:**

- The requested data must be within the jurisdiction of Findata.
- The registers to be extracted must be named in an understandable way (it is advisable to use the Aineistokatalogi.fi).
- The data to be extracted must be found at the variable level in the Findata table template.
- The time limit of the data must be unambiguous and reasonable for the research plan. The time limit should take into account the registry update schedules.
- The variables should correspond to the data in the Aineistokatalogi.fi (if the data is described in the Aineistokatalogi).
- A technical name for each variable should be found in the extractions from the Finnish Institute for Health and Welfare (THL).
- In the case of multi-stage extractions, the application must indicate the order in which the requested information is to be extracted. It is worth noting that in multi-stage extractions, there is no guarantee that the data will be available within 60 working days of the decision, as each controller has 30 working days to submit the data.

**Criteria for an approved application:**

- Findata has the authority to process the application.
- The application lists the data to be extracted at the variable level. For THL registers, technical variable names are included.
- The variable data corresponds to the data in the Aineistokatalogi or other variable descriptions of the registrar.
- If the application requests the extraction of data not only from the actual target group but also from control subjects and / or relatives, the application clearly indicates the data to be extracted for each group.
- The data to be extracted can be retrieved according to the schedule indicated in the application.
- The application indicates the order in which the data should be extracted.

**Criteria for a returnable application:**

- It is unclear from which registers the data is extracted.
- A variable level listing of the data to be extracted is missing.
- Missing technical names in THL's variable lists.
- There are problems with the extraction schedule, e.g. the register data cannot be provided according to the schedule requested by the applicant.
- The application does not indicate the order in which the requested data should be extracted.

## 7 Other data to be combined

### Please note:

- All data authorised by other actors to be included in the data created on the basis of Findata's data permit should be listed in the application. Data not provided in the application cannot be combined with the data authorised by Findata.
- For data authorised by other actors, the following information must be provided in the application:
  - Diary number of the permit, issuer of the permit, date of the permit.
  - If the permit process is ongoing, the party from whom the permit is applied for and the start date of the permit process.
  - Brief description of the contents of other data.
  - Permits for other data **should not be attached** to the application. We will request them separately in the application process if necessary.
- Previously granted permits must remain valid and the permits must relate to the same project as for which the Findata's permit is applied for.
- Note! If the target group has been extracted with a previously granted permit, this permit must be described in addition to the permits for other data.

### Criteria for an approved application:

- The application includes all the information listed above.

### Criteria for a returnable application:

- It is not clear from the application to which other data the data requested from Findata is being combined (although it seems that this is being done).
- It is not clear on which permits the use of other data is based or whether these permits are still valid.
- Data to be combined have been collected with consent, but handout and consent templates are not attached to the application.
- The consent model has been provided, but is out of date, and does not mention at all that the data collected with the consent will be combined with the register data sought in the data permit application.

## 8 Data processing

### Please note:

- The application must clearly indicate the secure environment in which the data is processed. Findata's Kapseli is always the primary option. If the data is applied for other environment, the application must justify the reasons why this is necessary. If the other environment has not been audited, it is worth taking into account the amendments to the Secondary Act that entered into force on 1 September 2021: <https://findata.fi/en/news/the-transition-period-related-to-requirements-for-secure-operating-environments-extended-by-one-year/>
- After granting the permit, Findata sends data requests to data controllers and coordinates the extraction of data. In principle, the data is always pseudonymised by Findata or a statistical authority. The application must clearly state both the procedure and the reasons if it is desired to create the data set in another way.
- In principle, the use of the data can be applied for for a maximum of five years. If the need is more than 5 years, the application must indicate that there is a real need to process the data for a longer period.
- When requesting the retention of material after the expiry of the permit, the need for retention must be described in the application.
- The data can be processed in the EU / EEA area. If the data is to be processed in other countries (the use of a remote access environment outside the EU / EEA countries is also considered as processing), the data transfer criteria must be found in the application.

### Criteria for an approved application:

- The application indicates that the data is to be processed in Findata's remote environment Kapseli or that another environment is clearly described and the need is justified in the application.
- There are no specifications to the other items listed above.

### Criteria for a returnable application:

- The application gives the impression that the data is intended to be transferred to an environment other than the Findata's Kapseli, but no valid justification has been given for the necessity of this (Section 20 (3) of the Secondary Act).
- The process of compiling the data is not feasible and the method of implementation is not justified (for example, researcher plan states that data controllers send data directly to the applicant, or applicant intends to combine and / or pseudonymise the data themselves).
- If the data is retrieved for a non-audited environment, the applicant should complete the environment criteria form. You can request the form in advance by e-mail [info@findata.fi](mailto:info@findata.fi).



## 9 Data utilisation plan

**Please note:**

- If the application states that the project has a research permit from the responsible organisation and / or an opinion from the ethics committee, these must be found as annexes to the application.
- The application must state the legal basis for the processing of personal data in relation to the data obtained from Findata and the data to be combined. The legal basis refers to Article 6 (1) of the GDPR.
- Regarding the issue of specific personal data, please note that almost all data under Findata's jurisdiction are specific personal data (e.g. health data, biometric data, genetic data, ethnic origin or sexual orientation or behavior).

**Criteria for an approved application:**

- The necessary attachments have been provided.

**Criteria for a returnable application:**

- Attachments are missing.
- The applicant applies for a permit to use specific personal data / sensitive information, but states that the information sought is not sensitive.
- There are obvious shortcomings in the data utilisation plan.

## 10 Additional information and attachments

**Please note:**

- In the Additional information section, you can also refine previous sections.

**Criteria for an approved application:**

- The necessary attachments have been provided.
- The application contains all the necessary information.
- The processing of the application can proceed to the cost estimate request either directly or with small clarifications.

**Criteria for a returnable application:**

- The required attachments have not been provided.
- The application indicates that the applicant has been or will be in contact with the controllers prior to the processing of the application, but the contact persons of the controllers have not been provided. For example, the applicant has agreed on a certain type of extraction with the controller, but it is not clear with whom the matter has been agreed.