

Model privacy policy

It is not necessary to compile a separate privacy policy for peer-review documentation, and it is recommended that the data be included as part of the publisher's other privacy policy. This model takes a stand on how the peer-review documentation could be taken into account in the privacy policy. The model is not comprehensive and does not constitute a privacy policy as such.

1. Controller

Name and contact details of the organisation.

2. Contact person in matters related to processing personal data

Name and contact details of the contact person.

3. Name of the privacy policy

E.g., Scholarly Publisher X's privacy policy.

4. Legal basis and purpose of the processing of personal data

Describe the legal basis and purpose of the processing of personal data in accordance with the scholarly publisher's own practices.

5. Description of the processing of personal data

Describe the processing, such as what personal data is being processed, the principles for storing the data, and who has access to the data in accordance with the practices of the scholarly publisher.

E.g., For both rejected and accepted peer-reviewed manuscripts, the following information will be recorded: date when the manuscript was received and date when decision was sent; the publication proposal by the authors; names of authors and name of manuscript; names of reviewers as well as opinions issued by the reviewers and decisions on the publication made by the editors and sent to the authors. The data shall be stored for a minimum of five years but the aim will be to store them permanently. After active use, the publisher may archive the data and material in the public interest or for scientific and historical research. In order to ensure responsible conduct of research, data relating to the peer-review process cannot in principle be erased.

Stored data is not public and is only processed by members of the editorial staff or members of the editorial staff and peer-reviewers in the case of open peer-review. In an assessment of the responsible conduct of research in peer-review the controller shall provide the necessary data to the persons responsible for the RCR process (Responsible conduct of research) at the investigating organization.

6. Regular sources of information

The sources of information are described in accordance with the practices of the scholarly publisher.

E.g., personal data regarding manuscripts is obtained from the authors and reviewers themselves.

7. Regular disclosure of data

Describe the possible disclosures of personal data in accordance with the practices of the scholarly publisher.

E.g., Personal data related to the peer-review process will be disclosed to the Federation of Finnish Learned Societies or the Finnish National Board on Research Integrity in an assessment of the peer-review process. Users are bound by an obligation of secrecy. Personal data relating to the peer-review process will not be disclosed to other third parties and personal data will not be transferred outside the EU or the EEA.

8. Principles of personal data protection

Described in accordance with the practices of the scholarly publisher.

E.g., The processing of personal data shall be carried out with due care and the data processed by information systems shall be adequately protected. The controller shall ensure that the stored data, user rights to the servers and other data critical for the security of personal data, is treated confidentially and only by those employees whose job description this is part of.

9. Right of inspection and rectification

Described in accordance with the practices of the scholarly publisher.

E.g., The data subject has the right to inspect the data file to verify what data about him/herself has been stored. However, in accordance with established conduct of research, the data subject is not entitled to find out the names of the peer-reviewers. Inspection requests must be made in writing and signed and sent to the controller's person in charge of personal data file matters. Inspection requests can also be presented in person at the address given above. When presenting an inspection request in person, the customer must provide valid proof of identity.

10. Other rights related to the processing of personal data

Described in accordance with the practices of the scholarly publisher.

E.g., The data subject has the right to request the erasure of personal data concerning him/herself insofar as this is not prevented by the legitimate interests or legal obligations of the controller. A request for erasure must be made in writing. The controller may have a justified need to store the personal data if it is still needed for the purpose for which it was collected. As regards data regarding the peer-review process, it should be noted that this data cannot, in

principle, be erased. The data subject also has the other rights under the EU's General Data Protection Regulation.

11. Changes to the privacy policy

Described in accordance with the practices of the scholarly publisher.

E.g., Changes to the privacy policy will be made by updating this document. If the changes are significant, the data subjects will also be informed by email, for example.