

Jarkko Reittu
Data Protection Officer

22.6.2026

European Data Protection Board

Statement on the Public Consultation: Guidelines 1/2026 on processing of personal data for scientific research purposes

Finnish Institute of Health and Welfare appreciates the opportunity to provide its opinion on this Guideline.

General comments on the guidelines

It would also be advisable to update the Guidelines once the effects of the Digital Omnibus package (COM(2025) 837 final) on the GDPR have become clear, in particular as regards the provisions concerning scientific research and the definition of personal data.

The Guidelines would benefit from more substantive treatment of data protection officers. For example, what is the role of the data protection officer in the context of scientific research; may a dedicated data protection officer be appointed for an individual research project; and to what may a data protection officer commit under the GDPR? Situations arise, particularly in EU-funded research projects, in which the research agreements require the data protection officer to assume responsibility for compliance with the data protection obligations of the research project. Such a requirement is incompatible with the requirements of the GDPR.

It would be useful if the Guidelines were accompanied by an examination of the research legislation of the Member States, possibly including a comparison of the differences between national frameworks and of how these might affect the application of the Guidelines. Such an overview of national research legislation could be provided as an annex to the Guidelines.

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Joint controllers

Paragraph 144 is unclear as to whether a contract on joint controllership must be concluded. The wording of this paragraph should be clarified to bring it into line with the GDPR, namely that, as an alternative to a contract, an arrangement between the joint controllers is sufficient. It would also be advisable for the Guidelines to emphasise that data subjects must be informed transparently of the arrangement between the joint controllers.

Deputy Director General

Mia Nykopp

Head of Unit,
Director of Legal Services

Kati Hepokorpi

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