



**THE NATIONAL
ARCHIVES OF FINLAND**

Feedback from the National Archives of Finland on Guidelines 1/2026 on processing of personal data for scientific research purposes

The National Archives of Finland (the NAF) welcome the Guidelines 1/2026 on processing of personal data for scientific research purposes to complete the already existing guidelines on the interpretation and application of the provisions in the General Data Protection Regulation (GDPR). The National Archives of Finland raise no objections regarding the questions addressed in the Guidelines or the content of the Guidelines in general.

As the data controller, the NAF considers the main legal basis for processing personal data contained in the archival documents, records, and data to be GDPR art. 6(1)(e), i.e., the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The task carried out in the public interest or public authority is based on the Act on National Archives (509/2025).¹ The national legislation includes several provisions under which the NAF is permitted to process personal data for archiving purposes in the public interest.²

The NAF understand that the present Guidelines exclusively address the regime for scientific research established by the GDPR. The present Guidelines may therefore become applicable to the NAF when the NAF conduct scientific and historical research and process personal data for that purpose.

Additionally, the present Guidelines provide useful information to the NAF, as research organizations and individuals rely on the archival documents, records, and data on an ongoing basis for scientific research, and may process personal data for scientific research purposes.

¹ The statutory duties of the NAF to e.g., ensure the archiving of documents and datasets of public authorities and promote the research and other use of datasets to be archived and of archived datasets, are laid down in Section 2 of the Act on National Archives (509/2025).

² It is laid down in Section 4 of the Data Protection Act (1050/2018) that personal data may be processed in accordance with point (e) of Article 6(1) of the GDPR if the processing of research material and cultural heritage material containing personal data and the processing of personal data included in their metadata for archiving purposes is necessary and proportionate to the aim of public interest pursued and to the rights of the data subject. Recently, the statutory basis of the NAF to process personal data contained in the national archival data repository for archiving purposes in public interest is further complemented by Section 19 of the new Archives Act (enters into force July 1, 2026).



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