

1. Title, nature and duration of research

Title of research: Learning-by-designing games: Generative AI as a design partner 2025

Type of research: Case study

Duration of research: From 6.11.2025 until the related PhD project (Eemeli Eiste) is completed (Expected in January 2029)

Duration of data processing: From 6.11.2025 until the related PhD project (Eemeli Eiste) is completed (Expected in January 2029)

2. Data controller

Research will be conducted in an employment contract with the Tampere University, indicating the University to be the data controller.

Tampere University Foundation sr
33014 Tampere University
Kalevantie 4, 33100 Tampere
Business ID: 2844561-8

3. Contact person regarding the research registry

Kristian Kiili
Åkerlundinkatu 5, 33100 Tampere
+358 40 8262951
kristian.kiili@tuni.fi

4. Contact information of the Data Protection Officer (not applicable to student-conducted research)

dpo@tuni.fi

5. Principal investigator or research group

Professor Kristian Kiili
Åkerlundinkatu 5, 33100 Tampere
+358 40 8262951
kristian.kiili@tuni.fi

6. Researchers

The following Tampere University's researchers:

Professor Kristian Kiili, Doctoral student Eemeli Eiste, Assistant professor Muhterem Dindar, Post-doctoral researcher Antti Koskinen.

7. Content of research records

Name, age, gender, answers to questionnaires, reflection text, game concept descriptions, and voice recordings from interviews (optional part of the study). Additionally, the researchers who organize the Foundations of game-based learning course in which this study is conducted, have access to students' email address and student ID.

8. Sources of personal data

Research participants will provide most of the data. Name is available in the University's Moodle area that is used in the research. Participants' name is asked also in the LimeSurvey tool, which is not connected to Moodle.

9. Purpose of processing personal data

The purpose of processing personal data is scientific research. The main objective of the study is to investigate students' experiences, engagement, and creativity when they use generative AI as a game design partner. Understanding of students' experiences, creative and cognitive agency and collaboration with AI is important to be able to develop pedagogical models for meaningful use of generative AI in education.

Name of the participants is needed to connect data collected in Moodle (course assignments) to questionnaire data collected with a survey tool. Age, gender and study programme are asked because they are reported as background data in the scientific publications. Prior knowledge questions and previous usage of generative AI are asked because they are assumed to influence on examined phenomena (use of AI as a design partner and related experiences).

10. Lawful basis for processing personal data

The lawful basis for processing under the EU's General Data Protection Regulation, Article 6 Paragraph 1, and the Personal Data Act, Section 4:

Public interest or the exercise of official authority:

Scientific or historical research purposes or statistical purposes

Participants have the right to withdraw from the research at any time without any consequences. In consent form, we emphasize that upon withdrawal, no further data collected from the participant will be used for research purposes. However, the data collected up to the point of withdrawal can still be used for the research purposes.

11. Sensitive personal data (special categories of data and criminal records)

No sensitive personal data will be processed during the research project.

No personal data concerning criminal convictions and offences will be processed during the research project.

12. Transfer or disclosure of data to external parties

Personal data is not transferred or disclosed to parties other than the members of the research group.

13. Transfer or disclosure of data outside the EU/EEA

Data stored in the research records will not be transferred to a country or an international organisation that is located outside the EU/EEA.

14. Automated decision-making

Decisions will not be made by automated means.

15. Data protection principles

Only digital material is collected. All processing of personal data takes place on the University's encrypted servers.

Protection of digital materials:

- ☒ usernames
- ☒ password
- ☒ multi-factor authentication (MFA)
- ☒ access management (IP address)
- ☒ collection of log data

Processing of data that directly identifies an individual:

- ☒ Directly identifiable data will be removed during the analysis stage
- ☒ The materials will be pseudonymised

Protecting data in transit:

- ☒ secure transmission: HTTPS protocol is used for data transfer.
- ☒ file encryption

16. Processing of personal data after the research project has been concluded

The pseudonymised data files are created and used in analyses (includes a mark of a given consent). Once pseudonymised data files are transferred to the university's secure, password-protected servers (TUNI network drive P and TUNI Linux server), raw data will be permanently destroyed from the used survey tool. The data collected in Moodle (students' course assignments) will be deleted according to rules of Tampere University (one year after course completion). All data will be permanently destroyed when the related PhD project (Eemeli Eiste) is completed (Expected in January 2029). The data and metadata will not be opened to the scientific community.

17. Data subjects' rights and possible restriction thereof

Data subjects (participants) have the following rights under the EU's General Data Protection Regulation (GDPR):

- Right of access
 - o Data subjects are entitled to find out what information the University holds about them or to receive confirmation that their personal data is not processed by the University.
- Right to rectification
 - o Data subjects have the right to have any incorrect, inaccurate or incomplete personal details held by the University revised or supplemented without undue delay. In addition, data subjects are entitled to have any unnecessary personal data deleted from the University's systems.
- Right to erasure
 - o In exceptional circumstances, data subjects have the right to have their personal data erased from the Data Controller's records ('right to be forgotten').
- Right to restrict processing:
 - o In certain circumstances, data subjects have the right to request the University to restrict processing their personal data until the accuracy of their data, or the basis for processing their data, has been appropriately reviewed and potentially revised or supplemented.
- Right to object
 - o In certain circumstances, data subjects may at any time object to the processing of their personal data for compelling personal reasons.
- Right to data portability
 - o Data subjects have the right to obtain a copy of the personal data that they have submitted to the University in a commonly used, machine-readable format and transfer the data to another Data Controller.
- Right to lodge a complaint with a supervisory authority
 - o Data subjects have the right to lodge a complaint with a supervisory authority in their permanent place of residence or place of work, if they consider the processing of their personal data to violate the provisions of the GDPR (EU 2016/679). In addition, data subjects may follow other administrative procedures to appeal against a decision made by a supervisory authority or seek a judicial remedy.

Contact information:

Office of the Data Protection Ombudsman

Street address: Ratapihantie 9, 6th floor, 00520 Helsinki, Finland

Postal address: PO Box 800, FI-00521 Helsinki, Finland

Switchboard: tel. +358 29 56 66700

Fax: +358 29 56 66735, Email address: tietosuoja@om.fi

The Data Controller follows a GDPR-compliant procedure for responding to subject access requests.