

Personal data and privacy impact assessment in research



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The EU has a set of rules that protect personal data. The General Data Protection Regulation Act (GDPR, May 2018) sets out the obligations for businesses and organisations, and rights for individuals for protecting personal data. A significant proportion of academic research involves dealing with personal data, and even though GDPR focuses primarily on business activities, the main principles of these regulations are relevant and applicable for any research activity that involves personal data.

Does your research contain personal information?

'Personal data' means any information relating to an identified or identifiable living individual (data subject); one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

Has the personal data been fully anonymized?

Some sets of data can be amended so that individuals cannot be identified from those data whether directly or indirectly. The GDPR does not apply to data that are rendered anonymous so that individuals cannot be identified. This means that to be GDPR compliant, there should be no way to de-anonymize the data, even by using external data sources.

Does your data contain special or sensitive personal data?

Sensitive Personal Data are personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, data concerning health, or sex life, sexual orientation, genetic data, or biometric data.

Do you share your data with other universities and/or outside the European Economic Area?

EU data protection law restricts cross-border data transfers unless:

- the transfer is to an adequate jurisdiction
- a lawful transfer mechanism exists
- or an exemption or derogation applies.

Also, you should ensure the correct paperwork (e.g. data transfer agreement) is in place before sharing data outside of Erasmus University Rotterdam.

Privacy Assessment needed?

The decision tree below will help you decide if a privacy assessment is needed. It gives quick and easy specific actions for data privacy in research projects. If you have doubts, please consult a privacy officer. See below for contact details.

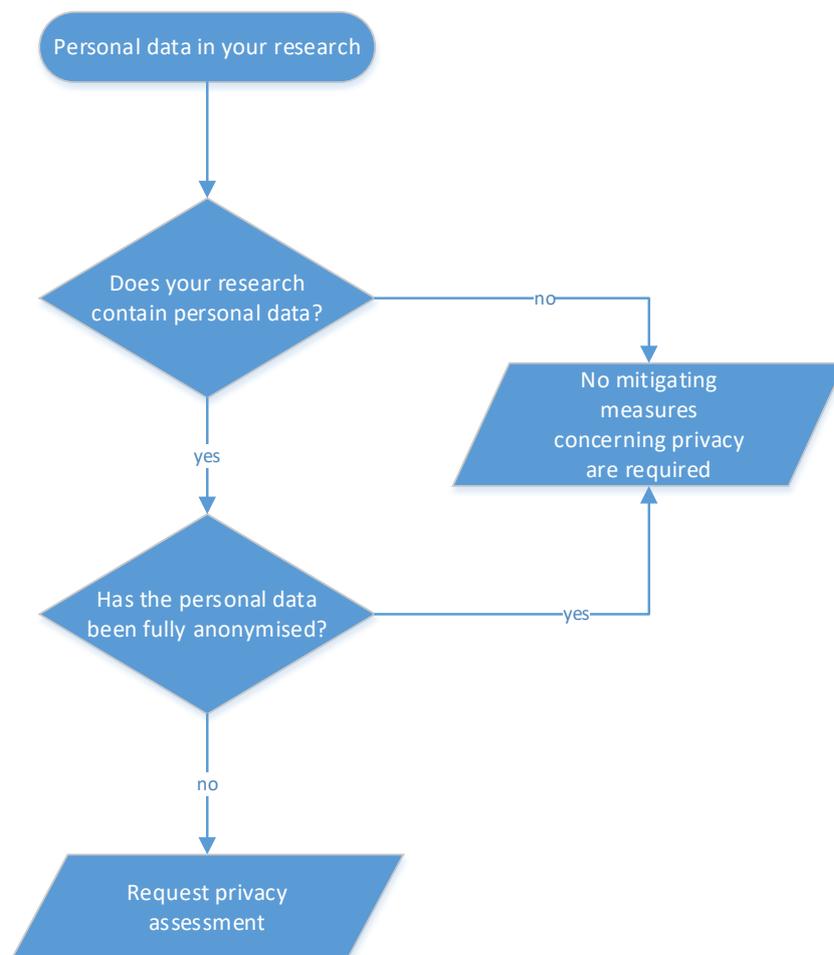


Figure 1 Decision tree for Privacy Assessment

The Privacy Impact Assessment is carried out by a privacy officer and/or data protection officer:

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