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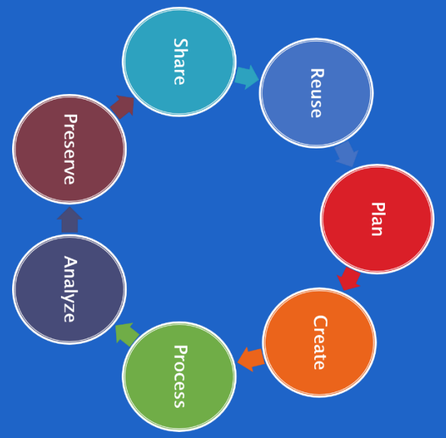
DISCLAIMER

The information provided in this presentation is based on a **current interpretation of the GDPR,** check the research tips and website for **updates**

This presentation **should not be seen as legal advice**



PRIVACY AND GDPR IN THE RESEARCH LIFE CYCLE

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GDPR IN THE RESEARCH LIFE CYCLE

PLANNING **Research proposal preparation/drafting**	**DATA COLLECTION**	**DATA STRUCTURING AND ANALYSIS**	**PUBLICATION AND ARCHIVING**
✓ Data ✓ Lawfulness ✓ Collaboration & partners ✓ Responsability ✓ Data transfers ✓ If necessary: processor agreements and/ or agreements for data transfer ✓ Data Protection Impact Assessment (DPIA) ✓ Research Data Management ✓ If necessary: ethical clearance	✓ Transparancy ✓ Primairy vs. secondary data collection ✓ Data subject rights & exceptions	✓ Data protection ✓ Data breaches	✓ Retention of personal data for research ✓ Reuse of personal data ✓ Publishing personal data ✓ Sharing personal data
✓ Register your processing activity (dmponline.be)	✓ Update the register if necessary	✓ Update the register if necessary	✓ Update the register if necessary

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PLANNING

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WHICH ASPECTS OF A RESEARCH PROJECT ARE IMPORTANT TO TAKE INTO ACCOUNT?

Data

→ Which information and type of data do you absolutely need?

→ What kind of personal data will you use (existing dataset, new dataset, acquired dataset, quantitative data, qualitative data, sensitive data, biometric data, ...)?

Lawfulness

→ On which legal ground will you process the personal data (i.e. consent, public interest, …)?

Collaboration & partners

→ What type of collaboration takes place in your research project (none, public-public, public-private, in/outside your institution, EU/ non-EU)?

→ Which countries participate in the research?

→ Where does the storage of data take place (EU / non-EU)?

Responsabilities

→ What are the different GDPR-responsabilities of you and your partners?

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WHICH ASPECTS OF A RESEARCH PROJECT ARE IMPORTANT TO TAKE INTO ACCOUNT?

Data transfer

→ Will you be sharing or transferring personal data?

→ Separate agreement or annex to data transfer/sharing agreement, consortium agreement or other type of contract

Data Protection Impact Assessment

→ Does your research constitute a potential high risk?

→ Assess the risks related to your research

Research data management

→ RDM policy of your institution

If necessary: ethical clearance from an ethics committee (≠ always advice on GDPR)

Register your processing activity in the GDPR Register of your institution

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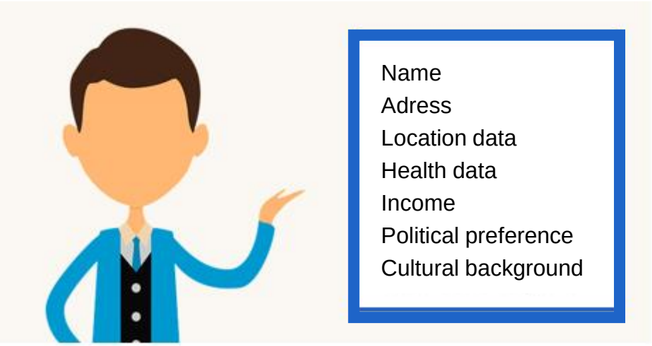
DATA

Personal data

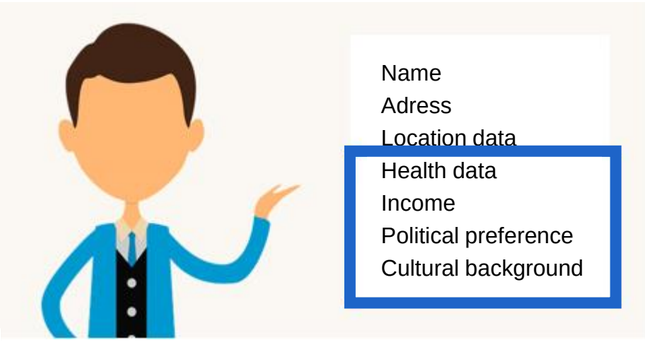
→ Data about **natural living persons** from which they can be **directly or indirectly identified** (name, identification number, location data, online identifier, factors specific to the physical, psychological, genetic, mental, economic, cultural, social,… identity of a natural person)

→ (combinations of) indirect identifiers can also lead to identification and are therefore also personal data



Special categories of data (sensitive data)

→ Racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, data on sex life or sexual orientation



! Confidential data

→ All data, personal data or other that is seen as confidential in a certain context or for specific reasons

→ I.e. financial data of a company are not personal data, but might be confidential data

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DATA

Pseudonymised data

→ Personal data (sensitive or not) that can only be **associated** with an identified or identifiable person by means of a **non-public (secret) key**

→ Data subject is are **only identifiable** with the use of **additional information/identifiers** that is kept separately

→ Pseudonymised data are still **personal data** (even if the identifiers are held by another organisation)

→ Pseudonymised data **= GDPR!**

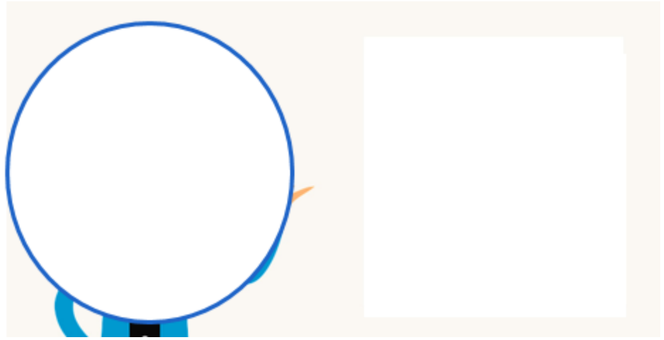
Anonymous data

→ Do not relate to an **identified or identifiable** natural person

→ Data subject is **not or no longer identifiable** (no person in any way)

→ Anonymised data **≠ GDPR**

→ The handling (**anonymisation**) **= GDPR!**



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DATA

Primairy data

The personal data will be collected **directly from** the data subjects within the research project

→ I.e. surveys

→ (Extra) ethics issues such as recruitment, risk of stigmatization, unexpected findings, …

→ GDPR applies

Secondary data

The personal data will **NOT be collected directly from** the data subjects within the research project

→ I.e. the personal data was collected in a previous research (project) by the same researcher or anothher researcher and will be reused

→ I.e. the researcher is using data from a public database such as the national register

→ GDPR also applies!

! Public data (i.e. online)

→ ≠ always ‘free’ to use

→ GDPR might still apply

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LAWFULNESS

Defining a legal ground as a condition

→ By the data controller (= research institution/researcher)

→ Before the processing personal data

→ One legal ground per processing/purpose

6 legal grounds for processing personal data (primary AND secondary)

1. **Consent of the data subjects**
2. Necessary for the performance of a contract
3. Legal obligations placed upon the controller
4. Necessary to protect the vital interests of the data subjects
5. **Carried out in the public interest or in the exercise of official authority**
6. Legitimate interest pursued by the controller

! Document the legal ground for processing personal data in the **GDPR register** (@UGent = dmponline.be)

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CONSENT AS LEGAL GROUND

Consent needs to

- → be **unambiguous**
- → be **specific**
- → be **freely** given, by a clear **affirmative** action
- → Consider specific **circumstances** and needs of the data subjects (using pictures, translation,…)
- → be **documented** (written or oral statement)
- → be obtained for each **separate** processing activity
- → address the possibility of **sharing** data, future data **publication** (including storage in a repository) or long-term retention of data for reproducibility
- → outline their **right to withdraw** their consent, and **how to** do this

! Consent as **legal basis** for processing personal data **≠ ethical consent** as an extra safeguard ('technical and organizational measures')

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CONSENT AS LEGAL GROUND

Extra information for data subjects

→ Data subjects have the right to withdraw consent at any time

→ Lawfulness (legal ground consent) of the processing before the withdrawal remains unaffected

Broad consent

→ Data subjects should be able to give their consent to certain areas of research

→ Not too wide, not too narrow

→ Important if you want to reuse the data for other purposes/ research

Consent from children under the age of 18 for the processing of their personal data

→ Obtain consent from the person who holds the parental responsibility over the child

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PUBLIC INTEREST AS LEGAL GROUND

Processing is **necessary** for the performance of **a task** in the **public interest** or a task assigned to the controller (host institution) in the exercise of public authority

Needs:

→ A basis (legislation) for this processing that is necessary for the performance of a task in the public interest

→ EU or national legislation

I.e. Scientific research in the public interest on the degree of participation
of youth in sports, media and culture in Flanders
(Article II.18 Higher Education Codex: UGent has a triple assignment in the field of higher education, scientific research and social and scientific services)

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SECONDARY DATA?

Check compatibility (legal ground of primary data collection)

- → If **legal ground primary data collection = consent:**
  - → Did the research participants consent to use their data in a future project?
  - → Does the purpose of your research fall within the **scope** of the given consent?
- → If the **legal ground of the primary data collection ≠ consent**: reuse for scientific purposes is **compatible** with the purposes for which the personal data were initially collected
  - → No ‘new’ legal basis required
  - → Pseudonymisation is required as a technical and organizational measure
  - → Information obligation remains, unless exception for research can be motivated

Importance

- → Publication and further processing
- → Lawfulness of processing
- → Transparency principle

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COLLABORATION & PARTNERS

Who needs to comply?

→ A data **controller** or data **processor based within the EU** who processes personal data of natural persons, from any other country **worldwide**

→ A data **controller** or data **processor** that is **based outside the EU** but processes **data of natural persons in the EU**

Within the EU

→ GDPR = applicable

→ Adequate data transfer mechanism under **GDPR**

Outside EU

→ GDPR ≠ applicable

→ Possible increased risk

→ **Adequate data transfer mechanism necessary**

! If you are enabling students in your research: confidentiality agreement necessary

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RESPONSIBILITY?

Individual researchers

→ Are responsible and must be able to demonstrate compliance, cf. UGent Generic Code of Conduct for the processing of personal data (UGent = data controller)

Data controller (on behalf of UGent): the institution / organization that determines the purpose and means of the processing

→ Simply providing funding for research is insufficient to be the data controller in the context of research, eg FWO

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RESPONSABILITY?

Joint controller (on behalf of UGent): the purpose and means of processing are determined by two or more organizations or institutions

→ Data processing agreement necessary between joint controllers

Separate controllers (on behalf of UGent): the purpose and means of the processing are determined by two or more organizations or institutions, but these are each separately responsible for processing for 1 specific processing activity

→ I.e. with clearly separable work packages in a research project

→ Data processing agreement not strictly necessary, but the separation needs to be clarified (in consortium agreement or other)

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RESPONSABILITY?

Processor: the institution, organization or researcher processes personal data on behalf of another institution or organization

→ I.e. services provided by a UGent researcher for the Flemish Government

→ I.e. UGent researcher processes accountancy data for governmental institution, industry association or professional organisation, e.g. Farm Accountancy Data for Ministry of Agriculture

→ Data Processing Agreement between controller and processor necessary

Subprocessor: the institution, organization or researcher processes personal data on behalf of another organization and asks another institution, organization or researcher to perform (part of) the processing on his / her behalf

→ I.e. services by a UGent researcher and part of a survey is outsourced to another researcher / institution

→ Data Processing Agreement between processor and subprocessor necessary

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DATA TRANSFER?

From EU to EU

→ Adequate data transfer mechanism under **GDPR**

→ But **data processing agreement or – clauses** necessary!

From EU to non- EU

→ **NO adequate** data transfer mechanism under **GDPR**, so other **adequate** data transfer mechanism nessecary!

= Adequacy decision of the EC: check the 'white list'
https://ec.europa.eu/info/law/law-topic/dataprotection/data-transfers-outside-eu/adequacy-protection personal-data-non-eu-countries_en

= Standard contractual clausules EC (non changeable!)

= Approved Code of conduct

= Derogation for special situations determined in art. 49 GDPR

→ **Data processing agreement or – clauses** necessary!

From non- EU to EU

→ **Check national (non-EU) legislation!** I.e. via https://www.cnil.fr/en/data-protection-around-the-world

→ **Data processing agreement or – clauses or authorisation** necessary!

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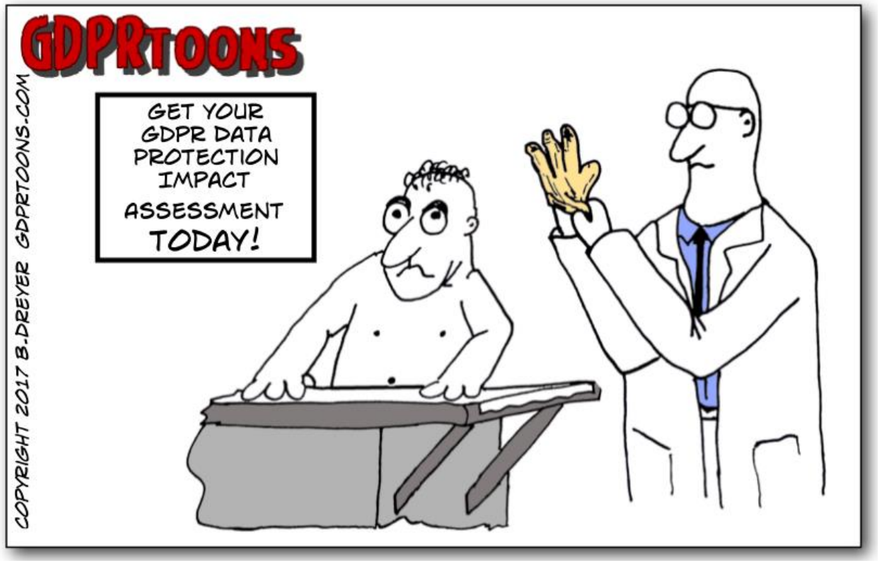
DATA PROTECTION IMPACT ASSESSMENT (DPIA)

What?

→ Instrument to identify and assess the risks of a future processing of personal data in your research



When necessary?

→ Mandatory if data processing poses a **probable high privacy risk** for the data subjects

→ At the start of your research, before data collection/processing

How?

1. Evaluate potential high risk (@UGent embedded in GDPR Register)
2. UGent Word-template DPIA or soon @UGent embedded in GDPR Register

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RESEARCH DATA MANAGEMENT

The bigger picture: personal data → research data

→ RDM policy of your institution
→ Privacy by design (!)
→ Create a **data management plan (DMP)** at the start of your research (mandatory for certain funders/ faculties)
→ If necessary get an **ethical clearance** by **an ethics committee**

Why?

→ Impact on possible risks for those involved
→ Impact on data handling and security measures during processing and storage
→ Impact on necessary (security) measures and agreements
→ Impact on the necessity of performing a data protection impact assessment (DPIA)
→ Impact on data sharing with other researchers
→ Impact on research and research outcome!

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REGISTER YOUR PROCESSING ACTIVITY

Obligation under GDPR

→ Processing of personal data

→ Principle of **accountability**

→ **@UGent:** Generic code of conduct for the processing of personal data and confidential information

GDPR register at UGent

→ Incorporated in **DMPonline.be** - Data Management Plans

→ Complete the **GDPR template** in your role as data controller on behalf of Ghent University or data processor

→ For more information check https://onderzoektips.ugent.be/en/tips/00001795/ or join a workshop

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DATA COLLECTION

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WHICH ASPECTS OF A RESEARCH PROJECT ARE IMPORTANT TO TAKE INTO ACCOUNT?

Transparency

- → Data subjects should be informed in a concise, transparent, intelligible and easily accessible form, using clear and plain language before the processing takes place
- → No matter the legal ground!
- → Exceptions for research (see following)

For primary data collection and reuse as secondary data

Data subject rights

- → Which rights do the data subjects have and which exceptions are there for research?
- → How can the data subjects exercise these rights?

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TRANSPARENCY

Principle of transparency

→ Obligation to **inform** data subjects
→ Data subjects should be informed in a concise, **transparent**, intelligible and **easily** accessible form, using **clear** and plain language
→ Information should be adjusted to the data subjects & research participants (i.e. children)
→ For primary & secondary data!

Information for data subjects (ethical reasons)

→ The **purpose** of the research
→ What is **involved** in participating in the research
→ Describe the **benefits** and **risks** of participating in the research
→ Indicate steps that will be taken to **safeguard** their anonymity and confidentiality
→ Details of the **research**, e.g. the funding source, institution, name of the project,…
→ Explain that taking part in the study is entirely **voluntary** and that refusal to agree to participate will involve no penalty or loss of benefits
→ Freedom to withdraw at any moment without consequence(s)
→ Discuss what will happen to their **contribution** (including the future archiving and sharing of their data)

TRANSPARANCY: PRIMARY DATA COLLECTION

Mandatory information for data subjects under GDPR

- → The identity and contact details of the **researcher** and the **DPO**
- → The **legal basis** and **purpose** of the processing of data
- → If applicable: the fact that you will use the data for **other purposes**
- → If applicable: the fact that the data will be **transferred/shared** with **other institutions/ researchers (recipients** of the data)
- → If applicable: the fact that the data will be **transferred** to a **third country or international organisation**
- → The period of **retention or criteria** to determine period of retention
- → Information about their **rights** and how to **exercise** their rights
- → A reminder that they have the right to lodge a complaint with the supervisory authority
- → The existence of automated decision-making, including profiling

! If you plan to process this data for **another purpose**: information obligation must be fulfilled before the processing (other purpose)

Integrated in information form

In line with (informed) consent form (if applicable)

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TRANSPARANCY: SECONDARY DATA COLLECTION

Mandatory information for data subjects under GDPR

→ The identity and contact details of the **researcher** and the **DPO**
→ The **legal basis** and **purpose** of the processing of data
→ If applicable: the fact that you will use the data for **other purposes**
→ If applicable: the fact that the data will be **transferred/shared** with **other institutions/ researchers (recipients** of the data)
→ If applicable: the fact that the data will be **transferred** to a **third country or international organisation**
→ The period of **retention or criteria** to determine period of retention
→ Information about their **rights** and how to **exercise** their rights
→ A reminder that they have the right to lodge a complaint with the supervisory authority
→ The existence of automated decision-making, including profiling
→ **EXTRA: The categories of personal data concerned**
→ **EXTRA: The source of the secondary data**
→ **EXTRA: If applicable: that the data originate from a public source**

! Within a **reasonable timing** (<1 month after receiving the data/ first contact/ before transfer)

! If you plan to process this data for **another purpose**: information obligation must be fulfilled before the processing (other purpose)

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TRANSPARANCY: SECONDARY DATA

Exception for research (only for the use of secondary data!)

→ If providing information is impossible of involves a disproportionate effort

→ Motivate in the Register (@UGent: dmponline.be)

→ Other GDPR requirements still apply!

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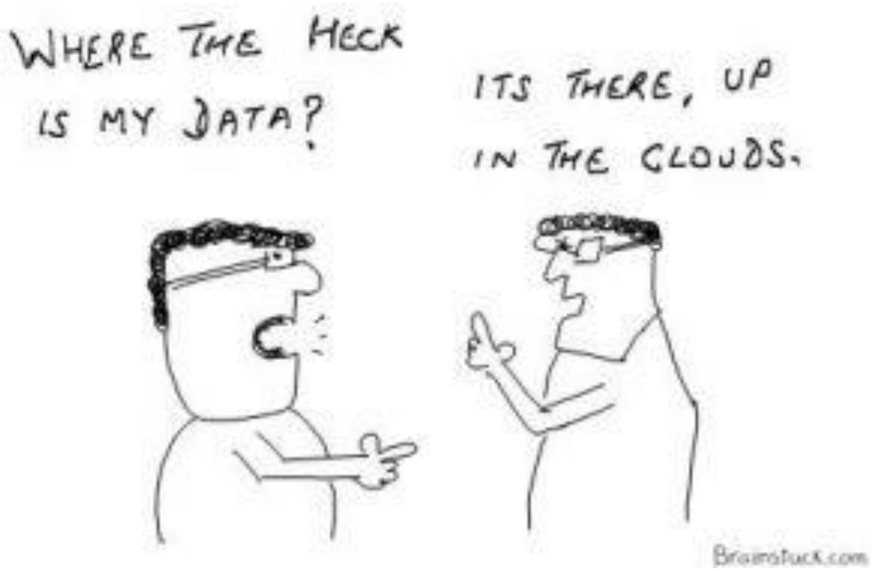
DATA SUBJECT'S RIGHTS

Data subjects have the right:

→ to be **informed** about which, how, why and when their personal data is processed
→ of **access** to their personal data
→ of **rectification** of their personal data
→ to **erasure (the 'right to be forgotten')**
→ to demand a restriction processing of their personal data
→ to **data portability** of their personal data
→ to **object** to (a part of) the processing
→ not to be subjected tot automatic decision making / profiling

! Verify the **legal** ground to see **which rights** can be exercised

! Inform data subjects **about their rights** and **how they can exercise them**



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DATA SUBJECT RIGHTS & EXCEPTIONS

Exception on the right to erasure (the ‘right to be forgotten’)

→ If the exercise of the right is likely to render impossible or seriously impair the achievement of the research objectives

→ Motivate in the Register (dmponline.be)

→ Other GDPR requirements still apply!

Exception on the right of access, the right to rectification, the right to restriction of processing and the right to data portability

→ If the exercise of the right is likely to render impossible or seriously impair the achievement of the research objectives

→ Motivate in the Register (dmponline.be)

→ Other GDPR requirements and **Belgian law** apply!!!

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DATA SUBJECT RIGHTS & EXCEPTIONS

Belgian law on the protection of natural persons with regard to the processing of personal data

→ Exception regime provided based on article 89 § 2 GDPR

→ If the exercise of the right **of access, the right to rectification, the right to restriction of processing and the right to data portability** is likely to render impossible or seriously impair the achievement of the research objectives

Extra obligations and measures cfr. Belgian Law:

→ **Motivation** for the exception

→ For the processing of **genetic, biometric or health data**: restricted access + access list necessary

→ **For primary data collection**: cascade anonymous/ pseudononymous data + motivation

→ **For secondary data collection or reuse of data**: agreement between primary and secondary processors needed attached to GDPR Register + cascade anonymous/ pseudononymous data + motivation

→ **Advise DPO necessary for anonymisation, pseudonymisation and de-pseudonymisation methods**

→ Different requirements for **communication and dissemination** of data

→ **Combining of multiple datasets**: trusted third party (TTP)

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DATA STRUCTURING AND ANALYSIS

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WHICH ASPECTS OF A RESEARCH PROJECT ARE IMPORTANT TO TAKE INTO ACCOUNT?

Data protection?

- → Where is the data?
- → How is the data?
- → Who has access to the personal data?
- → Data storage
- → Destruction of data

To prevent data breach!

- → Security incident

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DATA PROTECTION

Where is the data?

… on a local (UGent) server?
… in an external cloud?

Store the personal data on a safe place!

- → **Use the central disk space/storage** (personal disk space and shares) offered by your institution instead of storing files locally on your own IT resources (hard disk of desktop or laptop, USB stick, external hard disk,…).
- → **Do not use external cloud services** to store personal data or confidential information unless you encrypt this data
- → Be careful when saving sensitive data: risk assessment + encryption required!
- → **Regularly back-up data** which is not stored on the shares of your institution
- → **Personal data in paper format** (e.g. consent forms signed by research participants) should be kept in a secure area of a locked filing cabinet

DATA PROTECTION

How is the data…

…pseudonymised?

→ **Pseudonymise personal data as soon as possible**
and keep the file with the personal information in a secure place

…secured?

→ **Encrypt** your data if necessary

→ Basic principle: **do no harm**

→ Make the **right decisions**

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DATA PROTECTION

Who has access to the data?

… on a local (UGent) server?
… in an (external) cloud?

Protect your UGent account and the associated login details

Access to the raw data should be **restricted!**

→ Work on a trusted network
→ Use a trustworthy device (desktop, laptop, notebook, tablet, smartphone,…) which is sufficiently secured
→ Preferably work with the applications offered by your institution (for UGent offered on Athena.UGent.be
→ Install as few additional applications as possible on your devices
→ Be wary of phishing and malware infections via e-mails
→ Arrange **access conditions** in a consortium agreement, non-disclosure agreements, processor agreements,…

Be careful when data is “on the move” & during transmission of personal data

→ Encrypt files with personal data, avoid to transport raw data

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DATA PROTECTION

How long does the data need to be stored?

… on a local (UGent) server?
… in an (external) cloud?

Destroy data in a **consistent** and **reliable** way:

- → Deleting files from hard disk -> overwrite the files or use secure erasing software
- → USB and CD/DVD -> physical destruction works best
- → Data in paper format -> shred the files or treat them as confidential waste

Tips for safely working with IT (https://www.ugent.be/intranet/nl/op-het werk/ict/informatieveiligheid/overzicht.htm)

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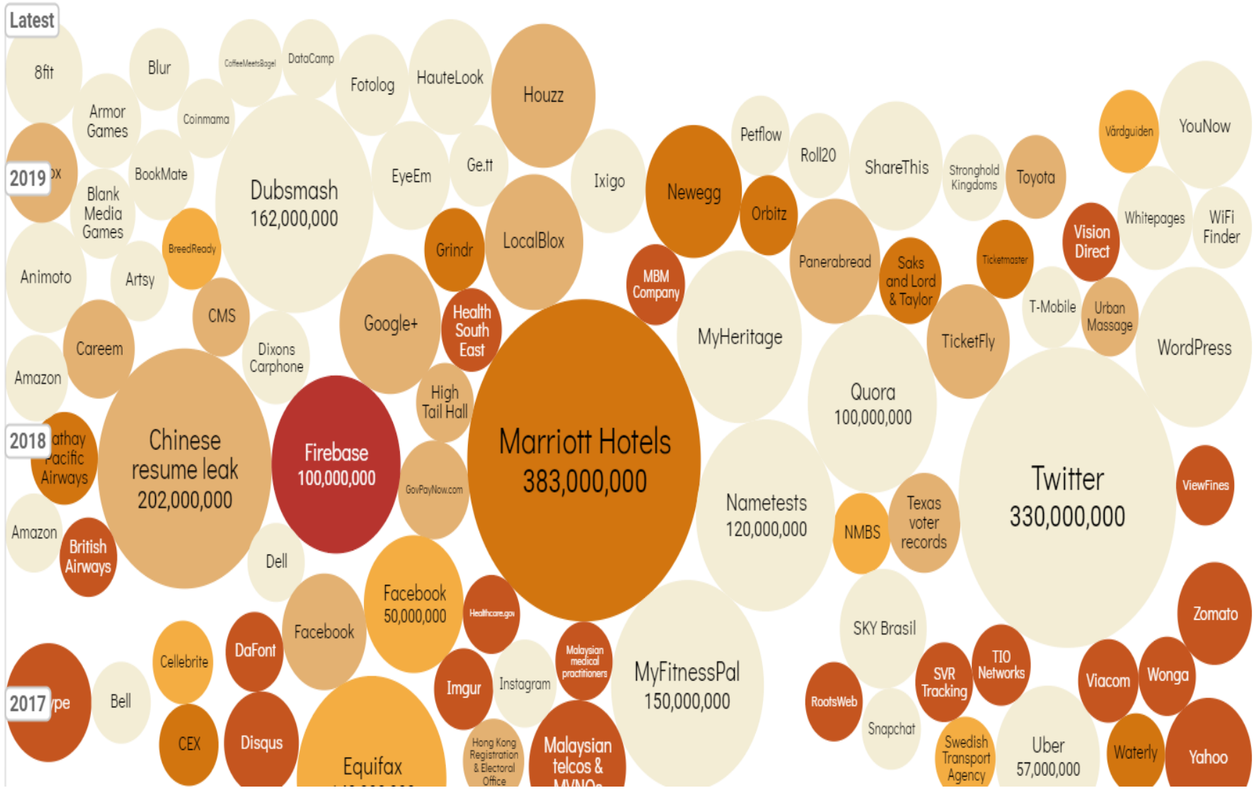
DATA BREACH?

A **security incident** that has affected the confidentiality, integrity or availability of **personal data** that results in a risk to the rights and freedoms of the data subjects

→ Not every security incident is a data breach

→ Every data breach is a possible security incident

→ It might potentially harm or threaten the rights and freedoms of natural persons



3 categories of data breaches with personal data

→ **Infringement of confidentiality:** unauthorized or unintended provision of or access to personal data

→ **Integrity breach:** unauthorized or unintentional change of personal data

→ **Infringement of availability:** unintentional or unauthorized loss of access to personal data or unintentional or unauthorized destruction of personal data

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DATA BREACH! WHAT NOW?

Inform the DICT Helpdesk as soon as possible via helpdesk@ugent.be

→First assessment of the infringement and potential risks

→Possible escalation to data protection officer, information of the security officer and other necessary parties

→Assessment of notification to supervisory authority and possible communication to stakeholders

Mandatory notification to data protection authority

→Infringements that are likely to present a risk to the rights and freedoms of natural persons

→Within 72 hours of being notified

→Not by yourself, but by UGent (together with DPO)

Mandatory notification to data subjects

→Infringements that are likely to involve high risk or high risk to the rights and freedoms of natural persons

→As quickly as possible

→Not by yourself, but by UGent (together with DPO)

Act fast!

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PUBLICATION AND ARCHIVING

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WHICH ASPECTS OF A RESEARCH PROJECT ARE IMPORTANT TO TAKE INTO ACCOUNT?

Retention of personal data

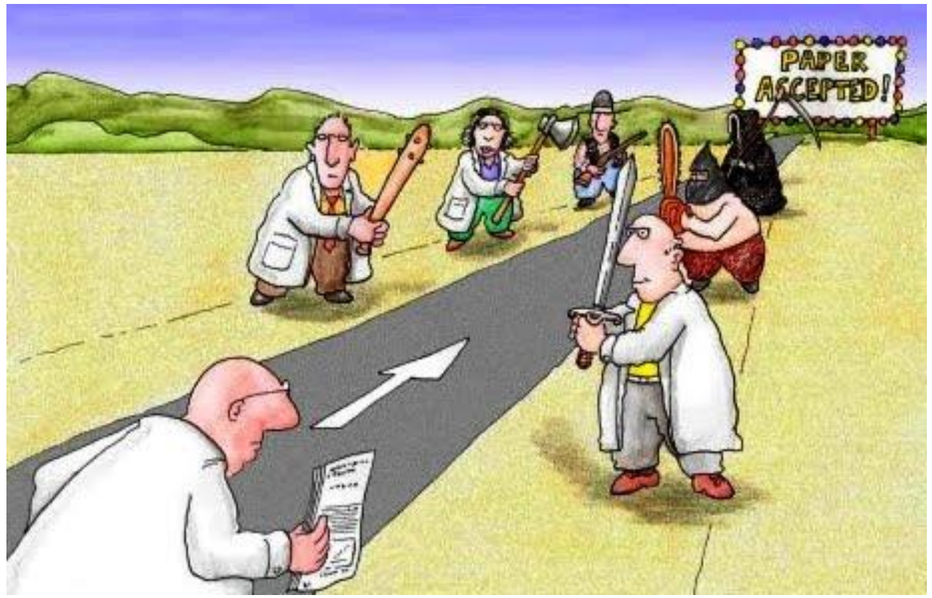
→ Principle of storage limitation
→ Exception for research
→ Retention vs. reuse

Reusing data

→ Check legal ground and compatibility
→ Transparency
→ Exception for research

Publishing personal data

Sharing personal data for publications



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RETENTION OF PERSONAL DATA FOR RESEARCH

Principle of storage limitation in GDPR

→ Only as long as necessary for the data processing

Exception for research

→ Personal data may be stored for longer periods if appropriate technical and organizational measures are taken to protect the rights and freedoms of the data subject

→ F.e. pseudonymization and encryption

RDM policy Ghent University

→ Data must be kept for up to five years after the end of the project (unless contract/law determines otherwise)

→ For scientific integrity purposes

Take the appropriate **security** measures!

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RETENTION VS REUSE

Retention (or storage) ≠ reuse

→ Retention or storage is for **verification and scientific integrity purposes**

Reuse of data (= secondary data)

→ Remember the **principle of compatibility** (lawfulness of primary data collection vs. lawfulness of secondary processing)

→ **Information obligation** (additional information required!)

→ **Exception on the information obligation** may be necessary

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REUSING DATA

Further processing/ reuse of data: check compatibility (lawfulness of primary collection)

- → If **legal ground primary data collection = consent:** did research participants consent to use their data in a future project? Does the purpose of your research fall within the **scope** of the given consent?
- → If **legal ground primary data collection ≠ consent**: reuse for scientific purposes is **compatible** with the purposes for which the personal data were initially collected
  - → No legal basis separate from that which allowed the collection of the personal data required
  - → Information obligation remains, unless exception for research can be motivated

Extra information to be provided to the data subjects

- → The categories of personal data concerned
- → From which source the personal data originate + if public source

Unless: exception on obligation to inform data subjects for research

- → If providing information is impossible of involves a disproportionate effort
- → Motivate in the Register (dmponline.be)
- → GDPR applies

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PUBLICATION OF PERSONAL DATA

Research participants should not be identified in published research results unless they have consented to being identified

→Information obligation applies (except for the exception of secondary data)

→Check requirements for consent (if consent is legal ground)

→Ethical considerations!

If identification of the persons involved is not necessary in publication: avoid

→Research results or output are, for example, at an aggregated level

→The data must be pseudonymised as quickly as possible and if possible

Providing data subjects with a copy/summary of the research results or research publications will support openness and transparency

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SHARING PERSONAL DATA FOR PUBLICATION

Required by some funders and journals

→ Different access categories

→ **Open access**: data can be used by any user

→ **Restricted access**: Access is limited and can only be granted upon request. Data can be shared with a user agreement/license

→ Always requires a **balancing of interests** between the need to provide data and the protection of personal data

Central research data management principle: as open as possible as closed as necessary

But

→ Only possible if the subjects (research participants) have given **consent for data sharing!**

→ **Select a trusted repository** with sufficient safeguards for sharing personal data

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GDPR IN THE RESEARCH LIFE CYCLE

PLANNING **Research proposal preparation/drafting**	**DATA COLLECTION**	**DATA STRUCTURING AND ANALYSIS**	**PUBLICATION AND ARCHIVING**
✓ Data ✓ Lawfulness ✓ Collaboration & partners ✓ Responsability ✓ Data transfers ✓ If necessary: processor agreements and/ or agreements for data transfer ✓ Data Protection Impact Assessment (DPIA) ✓ Research Data Management ✓ If necessary: ethical clearance	✓ Transparancy ✓ Primairy vs. secondary data collection ✓ Data subject rights & exceptions	✓ Data protection ✓ Data breaches	✓ Retention of personal data for research ✓ Reuse of personal data ✓ Publishing personal data ✓ Sharing personal data
✓ Register your processing activity (dmponline.be)	✓ Update the register if necessary	✓ Update the register if necessary	✓ Update the register if necessary

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WHY IS IT IMPORTANT TO KEEP TO THE RULES?

Non compliance:

→ **Bad research practice**

→ **Reputational damage** and **negative media attention** for the researcher, the research group and for Ghent University

→ **Negative media attention**

→ **Fines** of up to 20 million euros

→ **Indemnification or compensation** for data subjects

→ **Disciplinary measures** and **sanctions** within Ghent University (Generic code of conduct)

Compliance:

→ Good research practice

→ Sense of **responsibility**

→ **Quality and reliability** of the research and the research results

→ **Confidence of citizens and data subjects** in science

https://www.youtube.com/watch?v=fW8amMCVAJQ

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HELP?

RDM website

https://www.ugent.be/en/research/datamanagement/privacy.htm

(Re)search tips

https://onderzoektips.ugent.be/en/

Privacy@UGent.be

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IMPORTANT DOCUMENTS

GDPR

→ https://eur-lex.europa.eu/legal-content/NL/TXT/?uri=celex%3A32016R0679

Belgian law

→ http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=nl&la=N&table_name=wet&cn=2018073046

UGent

→ Generic code of conduct for the processing of personal data
https://www.ugent.be/intranet/en/regulations/code_of_conduct

→ Policy framework for research data management at Ghent University
https://www.ugent.be/en/research/datamanagement

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Questions?

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