



Thematic Privacy & Personal Data Protection Policy Scientific Research

The Use of Personal Data

One pager for researcher

When using personal data (definition: any information about an identified or identifiable natural person) in your research, it is important, as a researcher, to consider the following:

- How do I inform those whose personal data I use? [§2.1 & 2.5.7](#)
- Do I only use the personal data necessary to answer the research question (data minimization)? [§2.1](#)
- Can I pseudonymize or even anonymize personal data? [§1.2 & 2.1](#)
- Are personal data adequately secured (access restriction, at least pseudonymized, if necessary using encryption)? [§2.1 & 4.3](#)
- Is the processing of personal data (i.e.: the research) recorded in the processing register through the integrated application form for the GDPR, ethical review, and Data Management (possibly through GED Started)? [§2.1 & 3.2](#)
- Under which processing basis can I process the (special) personal data (as a rule: informed consent)? [§2.2-2.3](#)
- Is there a well-defined (specific), explicitly defined purpose for processing personal data (purpose limitation)? [§2.4](#)
- Is data management and storage in accordance with the Research Data Management Regulations? [§2.5.1](#)
- Did the Ethics Review Board impose any additional requirements? [§2.5.2](#)
- In the case of research based on consent: have I ensured that the requirements of informed consent have been met? [§2.5.3 & 3.1](#)
- In case of international collaboration: have I made it clear to my partner that the GDPR and Tilburg University's policy apply in this area? [§2.5.4](#)
- Do I have a clear understanding of whether and how to comply with the rights of data subjects (as referred to in the GDPR)? [§2.5.5-2.5.6](#)

In addition, the following issues come into play in the various phases of research:

PRIOR TO THE RESEARCH:

- Prepare the Informed Consent form (in case of consent-based research) [§3.1](#)
- Prepare a Data Management Plan (part of integrated application for the GDPR, ethical review, and Data Management) [§3.2](#)
- Conduct a pre-DPIA (part of the integrated application for the GDPR, ethical review, and Data Management) and if necessary a DPIA [§3.3](#)
- Drafting a Privacy Statement (when data subjects cannot be personally informed) [§3.4](#)
- If there are one or more other parties involved in the processing of personal data (including sharing of personal data prior to/during/after research): check whether it is necessary to enter into certain (privacy) agreements [§3.5](#)

DURING THE RESEARCH:

- Store personal data securely and restrict access to necessary persons [§4.1 & 4.3](#)
- Update the Data Management Plan when a change occurs in the collection of personal data [§4.2](#)
- Only use applications/programs with which agreements have been made by Tilburg University to collect, store, analyze, and share personal data [§4.4](#)
- Prevent traceable personal data from being included in the final article (unless explicitly agreed upon with the data subjects) [§4.5](#)

AFTER THE RESEARCH:

- Ensure that appropriate retention periods are used for research data [§5.1](#)

- Carefully preserve (and where possible pseudonymize/anonymize) the data in accordance with the Research Data Management Regulations [§5.2](#)