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GDPR and processing of personal data

The purpose of this document is to guide you as a student how to correctly handle personal data in your master thesis and other student assignments.

The guide consists of two parts. First, an introductory section on the rules for personal data. Then guidelines in seven steps for the practical handling. Also take the checklist for processing personal data as a help.

Basic principles for processing personal data

According to the GDPR, all processing of personal data must follow a number of basic principles.

<i>Transparency</i>	all personal data must be handled in a legal, transparent and correct manner.
<i>Purpose limitation</i>	personal data can only be used for specific purposes.
<i>Data minimization</i>	the personal data processed must be necessary for the purpose
<i>Correctness</i>	personal data must be correct and, if necessary, updated.
<i>Security</i>	personal data must be given adequate and appropriate protection.
<i>Storage minimization</i>	personal data should not be stored for longer than necessary.

GDPR and Swedish data protection legislation together form the framework for all processing of personal data at Chalmers. Personal data is all information that can be directly or indirectly attributed to a specific individual. Examples of personal data are name, address, e-mail address, picture, video, social security number, ID number, IP address, location information, user behavior (eg in traffic situations), opinions in survey responses, health data and nationality. The important question to ask is: *Can this information be linked to a specific individual?*

When you are considering using personal data in a master's thesis or student project, you should always ask yourself the question - *Is it necessary for me to use the personal data to achieve the goal of my work?* If you can achieve the goal with only anonymous data you should use that.

Who is responsible for the processing of personal data?

Chalmers is considered to be responsible for all processing of personal data at Chalmers, even in a master thesis. According to the GDPR, this responsibility entails a number of obligations. To handle personal data correctly is in the interests of both Chalmers and the data subject, and Chalmers therefore takes incorrect handling of personal data seriously.

Who is responsible for the processing of personal data at an internship?

If during your studies you carry out a dissertation or internship at a company or organization outside Chalmers that decides on the processing of personal data, this company or organization can be responsible for personal data. You should therefore always discuss the

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issue of personal data responsibility with your supervisor or examiner before starting your project. If you have any further questions, please contact our Data protection officer (DPO) at dataskydd@chalmers.se.

PRACTICAL GUIDELINES

1 Investigate your need to process personal data

Before you start collecting personal data for your master's thesis, thoroughly plan and think through your need for the use of personal data. The GDPR only allows the use of personal data that can be considered justified. It is therefore not permitted to collect personal data that might be "good to have" without further consideration.

What do you want to achieve with your project? Determine and limit your personal data processing to such processing that you can clearly justify. Do you need to access personal data that someone else has already collected for your purposes, or do you need to collect the data yourself? Can your goals be achieved with anonymous data that you receive from, for example a database outside Chalmers, the data is not personal data at Chalmers.

Whether a piece of information is considered anonymous or not according to the GDPR is determined by an assessment of whether there are possibilities to identify a person using aids that can reasonably be used as e.g. collection and alignment with data from public registers or other available sources. If very advanced technology, large costs or illegal data intrusion are required to identify a person, the information is not considered to be personal data. At the same time, it is important to remember that the term "personal data" has a broad definition.

2 Determine the purposes of processing personal data

The purposes of your work determine which personal data you need to process. If you are about to write your thesis, the purpose can e.g. be "to carry out your intended investigation which is necessary to substantiate your work". Other examples of purposes of processing personal data in student thesis can be:

- *to examine a limited group's choice of means of transport to and from work,*
- *to examine students' buying behaviors regarding food,*
- *to examine a group of people's screen time and its consequences.*

3 Do not process sensitive personal data

Special rules apply to the processing of "sensitive personal data", i.e. information about, for example, someone's ethnicity, health, genetic or biometric data. The possibilities in the GDPR, the Research Data Act and the Swedish Ethical Review Act to process sensitive personal data for research purposes cannot be applied within the framework of higher education at the undergraduate or advanced level as student work is not counted as "research" within the meaning of the law.

It is therefore, in the normal case, not permitted to process sensitive personal data in student work. Information on sensitive personal data is, for example:

- *illness and health in surveys of the use of digital care / health platforms,*
- *ethnic affiliation in surveys of choice of holiday resort,*
- *involvement in trade unions linked to work situation*
- *DNA, fingerprints, face shape or blood group.*

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4 Ensure adequate protection of personal data

It is important to safely store personal data during the work with your thesis. Therefore, use only Chalmers' permitted storage options in your student work. Permitted storage locations are Chalmers' file server and any other accounts to storage services assigned by Chalmers.

If your student work means that you will transfer personal data outside the EU/EEA, so-called third country transfer, GDPR prescribes special security requirements. If you have questions about this, contact Chalmers' data protection representative at dataskydd@chalmers.se.

5 Plan for discarding data

Personal data must not be handled for longer than necessary. It is therefore important to plan which personal data needs to be saved or deleted during the work. Normally, personal data is used only as a background information and should not be included in the thesis. Used personal data should normally be discarded out after your thesis has finally been reported and your grade registered in Ladok. Before you start collecting personal data, you should therefore check with your supervisor or examiner which material needs to be archived. All material that there is no reason to save must be discarded, which means that it must be permanently removed from all places where it has been saved.

6 Inform registered and obtain consent

Consent

Each personal data processing, for example the collection, processing, reading, transfer or other use of personal data must, in order to be considered permitted under the GDPR, have support in a legal/lawful ground. For student work, the legal ground is "consent". This means that when collecting or using personal data, you must obtain an approval from the registered person. Consent must be obtained *at the latest* in connection with the collection and use of personal data.

There are certain formal rules regarding the validity of a consent. Chalmers' form "Consent and information on the processing of personal data in student work" must therefore be filled in and used when obtaining consent. Consent must be obtained from each person whose personal data is used in a student project. The data subject always has the right to withdraw the consent. If this happens, you no longer have the right to process the personal data and the data must be discarded.

If you collect personal data from a database/other sources, you must investigate whether it is permitted to use the personal data for your "new" purpose. If it is possible to reach the individual in question, consent should be obtained. If it is not possible to reach the individual in question, you must first contact your supervisor and then, if necessary, Chalmers' data protection representative at dataskydd@chalmers.se for guidance.

Obtained consents with information must in connection with the presentation of your student work be communicated to your examiner or supervisor for archiving at the department.

Information

In connection with obtaining consent, the data subject must also be given information about the processing of the data. This means that the person needs to receive information about how the personal data will be processed, for what purposes and with whom the data will be shared. The information shall also contain information about the data subject's rights under

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the GDPR and about the right to submit complaints to the Data Inspectorate and that Chalmers' data protection officer can be contacted in case of questions.

All this is pre-printed in the form "Consent and information about the processing of personal data in student work". Customize this form and then use it in your contacts with the people who participate with their personal information for your student work.

7 Inform Chalmers about your personal data processing

Chalmers, as the entity legally responsible for personal data, is obliged to keep track of all processing of personal data that takes place at the university. In order to create an opportunity to overview all personal data processing, you as a student must fill in the form "Inventory and registration of processing of personal data in student projects". Chalmers needs this documentation in order to be able to present a list of all ongoing processing of personal data to the Swedish Data Inspectorate upon request.

Relevant documents

- Consent and information on processing of personal data in student work
- [Inventory and registration of processing of personal data in student projects](#)