

European Economic Area (EEA) and United Kingdom (UK) Privacy Statement for Research Participants

Effective starting May 25, 2018, last revised effective on January 1, 2021

The following statement has been prepared to provide notice to research participants whose EEA Personal Data or UK Personal Data is collected, used or otherwise processed by Tufts University, including its schools. This statement provides notice under the General Data Protection Regulation (GDPR) for the European Economic Area (EEA) and under the UK Data Protection Act 2018 (UK DPA). The GDPR and the UK govern the use and processing of personal information. Tufts is committed to processing your EEA Personal Data and UK Personal Data in compliance with the GDPR and the UK DPA and has prepared this statement to provide you with information about your rights under the GDPR and the UK DPA.

This statement should be read together with the [EEA and UK Privacy Statement](#).

1. What is “EEA Personal Data” and “UK Personal Data?”

For purposes of this statement for participants, your personal information is EEA Personal Data if it is “personal data” (as defined in the GDPR) and you are in the EEA when you provide the personal information to us in connection with being a research participant.

For purposes of this statement for research participants, your personal information is UK Personal Data if it is “personal data” (as defined in the UK DPA) and you are in the UK when you provide the personal information to us in connection with being a research participant, or your personal information is used or otherwise processed in connection with a university established activity in the UK.

The GDPR and the UK DPA define “personal data” broadly. It means any information relating to an identified or identifiable living, natural person. Examples of personal data include your name, an identification number, location data, an online identifier and factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

The GDPR and the UK DPA often use the term “processing,” which includes any way of working with personal data, from collecting to using to sharing to disposing of it.

2. How does this webpage relate to other information about data protection?

The general information published on this page is intended to supplement the specific information that you have already been given (for example on a participant information sheet or a consent form) in connection with your participation in a research study or project run by academic researchers affiliated with Tufts University. The below information applies to all studies and projects that are conducted by Tufts researchers. In the unlikely event that there is any contradiction between this general information and the specific information that you have already been given, the specific information takes precedence.

In addition to the information published here, when you use specific services and facilities offered by Tufts, you may be told about other uses of your EEA Personal Data and UK Personal Data. For example, there are separate statements for persons who use or engage with Tufts websites (see [Privacy Statement](#)) and IT services (see [Use of Institutional Systems Policy](#)).

3. What EEA Personal Data and UK Personal Data will be processed, who will process that Personal Data, and who will that Personal Data be shared with?

You have already been told about the types of personal information we will use in connection with the specific research study or project you are participating in and (where applicable) its sources, any data sharing or international transfer arrangements, and any automated decision-making that affects you.

You have already been told about the types of personal information we will collect and process in connection with the specific research study or project you are participating in and where and how we might collect those data, any data sharing or international transfer arrangements that may be part of the research project, and any automated decision-making that affects you.

4. Will my EEA Personal Data or UK Personal Data be transferred out of the EEA or the UK?

Your EEA Personal Data will be transferred out of the EEA to the USA and your UK Personal Data will be transferred out of the UK to the USA, which has different privacy laws than those of the EEA and the UK. Your EEA Personal Data may also be transferred to other countries and your UK Personal Data may also be transferred to other countries, which may have different privacy laws than those of the EEA and the UK. Tufts has adopted appropriate measures to protect your EEA Personal Data and UK Personal Data. In most cases, the transfer of your EEA Personal Data and UK Personal Data is necessary for the performance of a contract between you and Tufts, for the implementation of pre-contractual measures, for the conclusion or performance of a contract concluded in your interest, or for important reasons in the public interest. In limited circumstances, the transfer may be necessary for the establishment, exercise or defense of legal claims, to protect your vital interests, or as otherwise permitted by the GDPR or the UK DPA.

5. What are the purpose and legal bases of the processing of EEA Personal Data and UK Personal Data?

In general terms, we use your EEA Personal Data and UK Personal Data (including, where appropriate, EEA Personal Data and UK Personal Data that is sensitive) to carry out academic and/or translational research in the public interest.

6. How long will my EEA Personal Data and UK Personal Data be kept?

You have already been told about the long-term use (and, where applicable, re-use) and retention of your EEA Personal Data and UK Personal Data in connection with the specific research study or project you are participating in. General information about how long different types of information are retained by Tufts is published at [Records Retention Schedules](#).

7. What rights do I have with respect to my EEA Personal Data and UK Personal Data?

The GDPR and the UK DPA provide you with several specific data protection rights with respect to your EEA Personal Data and your UK Personal Data. These are generally described below. Further details, including how to submit a request, are published at [How to make a Subject Access Request](#). These rights are not absolute and each right is subject to limitations.

- *The right of access.* You have the right to confirmation of the EEA Personal Data or UK Personal Data that is processed about you by Tufts and to a copy of the information. Among the limitations is that that providing a copy will not adversely affect the rights of others.
- *The right to correct.* You have the right to have inaccurate EEA Personal Data and UK Personal Data rectified, or taking into account the purposes of the processing, completed if it is incomplete.
- *The right to erasure (also known as the right to be forgotten).* You have a right to have your EEA Personal Data and UK Personal Data erased in certain limited circumstances.
- *The right to restrict processing.* You have the right to request the restriction or suppression of processing (use) of your EEA Personal Data and UK Personal Data. This right only applies in certain circumstances. If processing is restricted, Tufts would not be permitted to use the data without your consent, unless in connection with a legal claim, the protection of another person, or other exceptions. Tufts would be permitted to continue to store the information.
- *The right to data portability.* The right to data portability allows you to obtain an electronic copy of your EEA Personal Data and UK Personal Data to enable you to reuse that data for your own purposes across different services.

This right allows you to move, copy or transfer EEA Personal Data and UK Personal Data easily from one IT environment to another. This right only applies to information you have provided to Tufts and depending on the context, applies to some of your information, but not to all of your information.

- *The right to object.* You have the right to object to the processing of your EEA Personal Data and UK Personal Data in certain circumstances, in the absence of a compelling reason for the continued processing.

8. Where can I go if I have questions?

If you have any questions about the particular research study you are participating in, please use any contact details you have already been supplied with.

If you have any questions about how your EEA Personal Data or UK Personal Data is used, or wish to exercise any of your rights, please consult the [EEA and UK Privacy Statement](#) and [How to make a Subject Access Request](#). If you need further assistance, please contact Tufts' Data Privacy Team at dataprivacy@tufts.edu.

If you are not happy with the way your EEA Personal Data is being handled, or with the response received from us, you have the right to lodge a complaint with the GDPR supervisory authority in the EEA country where you habitually reside or where you believe an infringement of the GDPR occurred.

9. Changes to this Privacy Statement

Tufts University reserves the right to change, modify, or otherwise amend this Privacy Statement at its sole discretion and at any time as it deems circumstances warrant. Any such changes will be posted on this page.

This Privacy Statement was last updated effective on January 1, 2021.