

European Economic Area (EEA) Privacy Statement for Research Participants

The following statement has been prepared to provide notice to research participants whose EEA 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). The GDPR became effective on May 25, 2018. The GDPR is a regulation adopted for the EEA that governs the use and processing of personal information. Tufts is committed to processing your EEA Personal Data in compliance with the GDPR and has prepared this statement to provide you with information about your rights under the GDPR.

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

1. What is “EEA 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. The GDPR defines “personal data” broadly. It includes “any information relating to an identified or identifiable natural person.” The person the personal data is about is called the “data subject.” 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.” GDPR. Article 4(1).

The GDPR often uses the term “processing,” which includes any way of working with personal data, from collecting to using to sharing to disposing of it. GDPR Article 4(2).

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. 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 will be processed, who will process my EEA Personal Data, and who will my EEA 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. What is the purpose and legal basis of the processing of EEA Personal Data?

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

5. How long will my EEA 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 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 Schedule](#).

6. What rights do I have with respect to my EEA Personal Data?

The GDPR provides you with several specific data protection rights with respect to your EEA 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 under the GDPR](#).

- *The right of access.* You have the right to confirmation of the EEA Personal Data that is processed about you by Tufts and to a copy of the information. This right is subject to limitations, including that providing a copy will not adversely affect the rights of others.
- *The right to correct.* The GDPR includes a right for you to have inaccurate EEA 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).* The GDPR includes a right for individuals to have their EEA Personal Data erased in certain limited circumstances. This right is not absolute.
- *The right to restrict processing.* You have the right to request the restriction or suppression of your EEA Personal Data. This is not an absolute right and 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 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 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.* The GDPR gives individuals the right to object to the processing of their personal data in certain circumstances, in the absence of a compelling reason for the continued processing.

7. 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 is used, or wish to exercise any of your rights, please consult the [EEA Privacy Statement](#) and [How to make a Subject Access Request under the GDPR](#). 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.

8. 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 on May 25, 2018.