Georgia Institute of Technology
Human Subjects Research

EU General Data Protection Regulation Privacy Notice

This is the privacy and legal notice for compliance with the European Union General Data Protection Regulation (“EU GDPR”) concerning the Georgia Institute of Technology (“Georgia Tech”) College of ___________________, Principal Investigator ___________________ (the “PI”), Research Title ___________________________, Research Protocol No. _____________ (collectively, the “Research Project”). For more information regarding the EU GDPR, please review Georgia Tech’s EU General Data Protection Regulation Compliance Policy.

Lawful Basis for Collecting and Processing of Personal Data

Georgia Tech is an institute of higher education involved in education, research, and community development. In order for Georgia Tech to conduct human subjects research, it must collect, use and process this personal data.

The lawful basis for the collection and processing of personal data by the PI for the Research Project falls under the following category: The data subject has given consent to the processing of his or her special categories of sensitive personal data for the conduct of research for the Research Project.

Types of Personal Data collected and why

In order for Georgia Tech and the PI to conduct the Research Project, the following categories of personal data may be collected: [[NOTE: these are examples only, please add or delete as necessary]]:

- Name
- Contact information including, without limitation, email address, physical address, phone number, and other location data
- Unique personal identifiers and biographical information (e.g. date of birth)
- Photographs of you
- Details of your education and/or employment qualifications
- Medical information including, without limitation, medical records and health data, including genetic or biometric data
- Information related to visa requirements, copies of passports and other documents to ensure compliance with U.S. laws
- Religious or philosophical beliefs
- Racial or ethnic origin
- Information concerning your sex life or sexual orientation

The personal data collected by the PI for the Research Project will be shared as follows:

<table>
<thead>
<tr>
<th>Georgia Tech Unit</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Georgia Tech Central IRB</td>
<td>Incidental access related to protocol review and research support</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Third-Party Name</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>GSU/GT Joint Center for Advanced Brain Imaging</td>
<td>Incidental access related to protocol review and research support</td>
</tr>
<tr>
<td>IRB</td>
<td></td>
</tr>
<tr>
<td>Office of Sponsored Programs</td>
<td>Incidental access related to research support</td>
</tr>
<tr>
<td>Office of Information Technology</td>
<td>Incidental access related to research support</td>
</tr>
</tbody>
</table>

If you have specific questions regarding the collection and use of your personal data, please contact the PI at ______________________ and the Office of Research Integrity Assurance at irb@gatech.edu.

If a data subject refuses to provide personal data that is required by Georgia Tech in connection with one of Georgia Tech’s lawful bases to collect such personal data, such refusal may make it impossible for Georgia Tech to conduct the requested Research Project.

**Where Georgia Tech gets Personal and Special Categories of Sensitive Personal Data**

Personal data and special categories of sensitive personal data collected for the Research Project are collected directly from the data subject pursuant to an affirmative consent permitting such collection and use for the Research Project.

**Individual Rights of the Data Subject under the EU GDPR**

Individual data subjects covered by Georgia Tech’s EU General Data Protection Regulation Compliance Policy will be afforded the following rights:

a) information about the controller collecting the data  
b) the data protection officer contact information  
c) the purposes and legal basis/legitimate interests of the data collection/processing   
d) recipients of the personal data  
e) if Georgia Tech intends to transfer personal data to another country or international organization  
f) the period the personal data will be stored  
g) the existence of the right to access, rectify incorrect data or erase personal data, restrict or object to processing, and the right to data portability  
h) the existence of the right to withdraw consent at any time  
i) the right to lodge a complaint with a supervisory authority (established in the EU)  
j) why the personal data are required, and possible consequences of the failure to provide the data  
k) the existence of automated decision-making, including profiling
l) if the collected data are going to be further processed for a purpose other than that for which it was collected

**Note:** Exercising of these rights is a guarantee to be afforded a process and not the guarantee of an outcome.

Any data subject who wishes to exercise any of the above-mentioned rights may do so by filing such request with the Office of Research Integrity Assurance at irb@gatech.edu.

**Cookies**

Cookies are files that many websites transfer to users’ web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user. Our website uses persistent cookies in conjunction with a third party technology partner to analyze search engine usage and web traffic patterns. This information is used in the aggregate to monitor and enhance our web pages. It is not used to track the usage patterns of individual users.

**Security of Personal Data subject to the EU GDPR**

All personal data and sensitive personal data collected or processed by Georgia Tech under the scope of the Georgia Tech EU General Data Protection Regulation Compliance Policy must comply with the security controls and systems and process requirements and standards of NIST Special Publication 800171 as set forth in the Georgia Tech Controlled Unclassified Information Policy.

**Georgia Open Records Act**

As a state university, Georgia Tech is subject to the provisions of the Georgia Open Records Act (ORA). Except for those records that are exempt from disclosure under the ORA, the ORA provides that all citizens are entitled to view the records of state agencies on request and to make copies for a fee. The ORA requires that Georgia Tech produce public documents within three business days. For more information on Georgia Tech’s ORA compliance, please visit the Open Records Act page on the Legal Affairs website.

**Data Retention**

Georgia Tech keeps the data it collects for the time periods specified in the University System of Georgia Records Retention Schedules: [https://www.usg.edu/records_management/schedules/](https://www.usg.edu/records_management/schedules/)

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Retention Schedule Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>Research Data (Human or Animal Subjects or Agriculture): Record 0472-09-004</td>
<td><a href="https://www.usg.edu/records_management/schedules/932">https://www.usg.edu/records_management/schedules/932</a></td>
</tr>
<tr>
<td>Institutional Research Records: Record 0472-09-002</td>
<td><a href="https://www.usg.edu/records_management/schedules/932">https://www.usg.edu/records_management/schedules/932</a></td>
</tr>
</tbody>
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