



2.11.2 Data Protection Assessment			
	Question	Help Text	Guidance
2.11.2.3	<i>List all types of personal data (including any special category or sensitive personal data) that you will process during the lifecycle of the project.</i>	See Guidance - please review carefully before answering. Please only include personal data processed for your research project ( <b>not administrative data, such as, for example, contact details used to share a questionnaire or a consent form used to evidence informed consent</b> ).	<p>List all personal data that you will collect, including any special category / sensitive personal data. Sensitive personal data includes special categories of data (a sub-category of personal data, and listed in Article 9 GDPR (see below) as well as personal data relating to criminal convictions or offences.</p> <p><b>Examples of personal data:</b></p> <ol style="list-style-type: none"> <li>1. Interviews with participants</li> <li>2. Transcripts</li> <li>3. Audio / video/ digital recordings</li> <li>4. Questionnaires / Surveys</li> <li>5. Photographs</li> <li>6. ID (Staff, Student, Research ID etc.)</li> <li>7. Date of Birth</li> <li>8. Online identifiers (IP address, cookies etc.)</li> <li>9. Location data (GPS etc.)</li> <li>10. Indirect identifiers (age, occupation, ethnicity, marital status, Eircode) i.e. information not unique to an individual but when combined with multiple identifiers, can identify the individual.</li> <li>11. Professional qualifications</li> </ol> <p><b>Definitions</b></p> <p><b>Personal data:</b> Any information relating to an identified or identifiable living individual. In general terms, personal data means information about a particular living individual.</p> <p>‘Identifiable’ means a living individual who can be identified directly or indirectly in particular by an identifier such as: name, address, identification number (staff ID, participant ID reference code used instead of name), location data, an online identifier such as an internet protocol (IP) address, Internet cookie identifier, or other identifiers such as radio frequency identification tags, or any one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that living individual.</p> <p><u>Even when personal data has been replaced by a code (i.e. pseudonymised) it should still be considered as ‘personal data’ if it is possible to link back to the individual using this code.</u></p> <p><a href="#">Link to Trinity Data Protection handbook</a> for further examples of personal data or information of relevance (see page 8).</p>



			<p><b>Special categories of personal data:</b> Data revealing a data subject’s racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs, data relating to trade union membership, genetic data, biometric data for the purpose of uniquely identifying a data subject, data concerning health and data concerning a data subject’s sex life or sexual orientation. Processing of special categories of personal data can only be carried out under specific circumstances.</p> <p><a href="#">Link to Trinity Data Protection handbook</a> for further examples of personal data or information of relevance (see page 8).</p> <p><b>Data concerning health:</b> Information relating to the past, present or future physical or mental health of a living individual, including the provision of health care services. It includes any information resulting from analysis of the body, or samples, and any information on a disease, disability, clinical treatment etc., whether from a healthcare practitioner or from an in vitro diagnostic test (i.e. regardless of its source).</p> <p><b>Genetic data:</b> Under the GDPR, genetic data is defined as information relating to the inherited or acquired genetic characteristics of an individual which give unique information about the physiology or health of that person, and which result in particular from an analysis of a biological sample such as (DNA) or ribonucleic acid (RNA) analysis or another element enabling equivalent information to be obtained from that person.</p> <p>Please note that if you are using genetic data, you should have separate consent for this (unless it is inherent to the research project – i.e. it is the purpose of the research). Please note that the European Data Protection Board strongly advises that genetic data can never be considered to be truly anonymous.</p> <p><b>Biometric data:</b> Information resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of an individual, which are used to identify that individual.</p> <p>Examples of biometric data used to identify an individual are facial recognition, voice recognition, keystroke analysis, gait analysis etc. Please note that if your research uses biometric data, it is likely you are also using new technology and as such a DPIA will be required.</p> <p><b>Anonymised data:</b> Information which has been irrevocably anonymised (i.e. no key exists anywhere) and it is not possible to identify an individual from a combination of the data held by you or a third party. This is a two-part test. See <a href="https://www.tcd.ie/dataprotection/research/">https://www.tcd.ie/dataprotection/research/</a> for further information.</p> <p>See the <b>Data Protection Commission’s Guidance Note</b> for information on pseudonymisation and anonymisation techniques: <a href="https://www.dataprotection.ie/sites/default/files/uploads/2019-06/190614%20Anonymisation%20and%20Pseudonymisation.pdf">https://www.dataprotection.ie/sites/default/files/uploads/2019-06/190614%20Anonymisation%20and%20Pseudonymisation.pdf</a>.</p>
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