



## UniCoV - Trinity College Dublin - Privacy Notice

### Introduction

This is a statement of the practices of Trinity College Dublin, the University of Dublin ('Trinity College' / 'the University') in connection with the processing of personal data for the purposes of the UniCoV study and the steps taken by Trinity College as a data controller to safeguard individuals' rights under data protection legislation, specifically the EU General Data Protection Regulation 2016 ('GDPR') and Data Protection Acts 1988-2018.

Trinity College fully respects an individual's right to privacy and actively seeks to preserve the privacy rights of data subjects who share personal data with the University. Any personal information which you provide for the purposes of the UniCoV study will be treated with the highest standards of security and confidentiality and in compliance with data protection legislation.

This Privacy Notice explains the following

- The purpose and legal basis for processing your personal data;
- How the University securely stores your personal data;
- Details of third parties with whom data is shared;
- How long data is retained; and
- Your rights under data protection legislation.

### Purpose and legal basis for processing personal data

As a controller of personal data, Trinity College takes all appropriate measures to ensure that data is processed fairly and lawfully and in accordance with the principles of data protection as set out under Article 5 GDPR.

Trinity College processes your personal data to administer the UniCoV study as set out in the [Trinity College Participant Information Sheet](#), available at:

<https://www.tcd.ie/ttmi/unicov/participantleaflet.pdf>. The goal of the UniCoV study is to develop and inform SARS-CoV-2 rapid testing and surveillance systems in further and Higher Education Institutes in the Republic of Ireland and to assist the return to campus activity.

Please note that before you can participate in the UniCoV study you will be asked to acknowledge that you have read, understood and agreed to the [Trinity College Participant Information Sheet](#) and [Trinity College Consent Form](#).

Most of the personal data we process will be obtained from you directly, however we will also obtain personal data about you from your laboratory test results.

Personal data will only be processed for the specific and lawful purpose of registering for and participation in the UniCoV study. The legal bases for processing are:

- [Article 6\(1\)\(e\) GDPR](#): 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.



- Article 9(2)(j) GDPR: ‘processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.’

In addition, study participants are required to provide explicit consent via the Trinity College Consent Form, in compliance with the Irish Health Research Regulations 2018.

### **How we securely store your personal data**

Personal data will be stored confidentially and securely as required by the Trinity College Information Systems Security Policy and Data Protection Policy. The University is committed to ensuring that the processing of your data is safeguarded by appropriate technical and organisational security measures relevant to the processing in accordance with Article 32 GDPR requirements.

When we store your personal data on our IT systems the data will be stored either on University premises or on secure IT platforms within the European External Area (‘EEA’) or external of the EEA which are subject to Chapter V GDPR requirements.

### **Details of third parties with whom we share data**

Trinity College will only share your data with third parties where necessary for the purposes of processing outlined in this Privacy Notice and in the Trinity College Participant Information Sheet. When we share your data with third parties Trinity College will ensure that the data is processed according to specific instructions and that the same standards of confidentiality and security are maintained.

#### **1. Research Partners:**

You will not be identified personally in any report or publication arising from the analysis of your samples and/or data. Non-identifiable aggregate metrics only will be shared with our partner universities (number of participants, positivity rates etc.).

Partner University Research Study Leaders:

- Dr. Breda Smyth, Director of Public Health, HSE West, Merlin Park, Galway. [breda.smyth@hse.ie](mailto:breda.smyth@hse.ie)
- Prof. Charles Spillane, Genetics & Biotechnology Lab, Ryan Institute, National University of Ireland Galway, University Road, Galway. [charles.spillane@nuigalway.ie](mailto:charles.spillane@nuigalway.ie)
- Prof. Mary Horgan, Royal College of Physicians of Ireland & University College Cork, College Road, Cork. [m.horgan@ucc.ie](mailto:m.horgan@ucc.ie)
- Dr. John MacSharry, School of Medicine & School of Microbiology, University College Cork, College Road, Cork. [j.macsharry@ucc.ie](mailto:j.macsharry@ucc.ie)



- Prof. Patrick Mallon, School of Medicine, University College Dublin, Belfield, Dublin 4. [paddy.mallon@ucd.ie](mailto:paddy.mallon@ucd.ie)
- Prof. Grace Mulcahy, School of Veterinary Medicine, University College Dublin, Belfield, Dublin 4. [grace.mulcahy@ucd.ie](mailto:grace.mulcahy@ucd.ie)

## 2. Service Providers:

Trinity College utilises the services of third party data processors, including IT software service providers. Personal data is shared with data processors in compliance with Article 28 GDPR which requires that Trinity College, as a data controller, shall use only processors providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet GDPR requirements and ensure the protection of the rights of the data subject. Further detail is available upon request.

### **How long we retain your data**

In keeping with the data protection principle of storage limitation we will only retain your data for as long as is necessary for the purposes of the study and in accordance with the Trinity College [Records Management Policy](#).

The determined retention period for Trinity College-controlled UniCoV study data (identifiable personal data) is 15 years.

We will also keep the aggregate (non-identifiable) data indefinitely for further research in the post-pandemic phase.

### **Your rights under data protection law**

You have the following rights over the way we process your personal data. For further information please see the Trinity College [Data Subject Rights Requests Procedure](#).

Right of Access: You have the right to request a copy of the personal data which is processed by Trinity College and to exercise that right easily and at reasonable intervals.

Consent: You may withdraw your consent to Trinity College processing your personal data at any time, when consent is the legal basis for the processing. To withdraw your consent, we require you to advise the University in writing.

Rectification: You have the right to have inaccuracies in personal data that we hold about you rectified.

Erasure: You have the right to have your personal data deleted where we no longer have any justification for retaining it, subject to exemptions such as the use of pseudonymised or anonymised data for scientific research purposes.

Object: You have the right to object to processing your personal data if:



- We have processed your data based on a legitimate interest or for the exercise of the public tasks of the University if you believe the processing to be disproportionate or unfair to you.
- We have processed the personal data for scientific or historical research purposes or statistical purposes unless the processing is necessary for the performance of a task carried out for reasons of public interest.

**Restriction:** You have the right to restrict the processing of your personal data if:

- You are contesting the accuracy of the personal data.
- The personal data was processed unlawfully.
- You need to prevent the erasure of the personal data in order to comply with legal obligations.
- You have objected to the processing of the personal data and wish to restrict the processing until a legal basis for continued processing has been verified.

## Cookies

We use information gathered from cookies to help improve your experience of the Trinity College UniCoV website. Some cookies are essential so you can move around the website and use its features. Our website also contains third party cookies which are listed in the Trinity College [Cookie Register](#). You can refuse or consent to third party cookies when you first visit our website or by following the guidelines in our [Cookie Policy](#).

## Further information

If you have any queries relating to the processing of your personal data for the purposes outlined above or you wish to make a request in relation to your rights you can contact the Trinity College UniCoV Principle Investigators or Co-Investigators:

- Prof Orla Sheils - [osheils@tcd.ie](mailto:osheils@tcd.ie)
- Prof Aideen Long - [longai@tcd.ie](mailto:longai@tcd.ie)
- Dr David McGrath - [David.Mcgrath@tcd.ie](mailto:David.Mcgrath@tcd.ie)
- Mr Patrick Magee - [mageep@tcd.ie](mailto:mageep@tcd.ie)

If you wish to make a complaint or escalate an issue relating to your rights you can contact the Trinity College Data Protection Officer:

- Mr John Eustace, Data Protection Officer, Secretary's Office, Trinity College Dublin, Dublin 2 - [dataprotection@tcd.ie](mailto:dataprotection@tcd.ie)

The Trinity College Privacy Notice (General) is available to view at: <https://www.tcd.ie/privacy/>.

The UniCoV Privacy Notice (General) is available to view at: <https://unicov.org/privacy-policy/>.

If you are not satisfied with the information we have provided to you in relation to the processing of your personal data or you are dissatisfied with how Trinity College is processing



your data you can raise a concern with the Data Protection Commission at:  
<https://forms.dataprotection.ie/contact>.

## **Definitions**

**Personal data:** Any information relating to an identified or identifiable natural person ('data subject').

**Special Categories of Personal Data (Sensitive personal data):**

- Data concerning health
- Personal data revealing racial origin, ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade-union membership
- The processing of genetic data for the purpose of uniquely identifying a natural person
- The processing of biometric data for the purpose of uniquely identifying a natural person
- Data concerning a natural person's sex life or sexual orientation

**Processing:** Any operation or set of operations performed on personal data. Processing includes storing, collecting, retrieving, using, combining, erasing and destroying personal data, and can involve automated or manual operations.

**Data subject:** Someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Data controller:** An organisation, such as Trinity College, which determines the purposes and means of the processing of personal data.

**Data processor:** A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller, traditionally under contract. This does not include Trinity College staff who are processing personal data on behalf of the University as part of their employment duties and who are subject to the University's policies and procedures.

**Date: 15/07/2021**