Register of Processings – Manual

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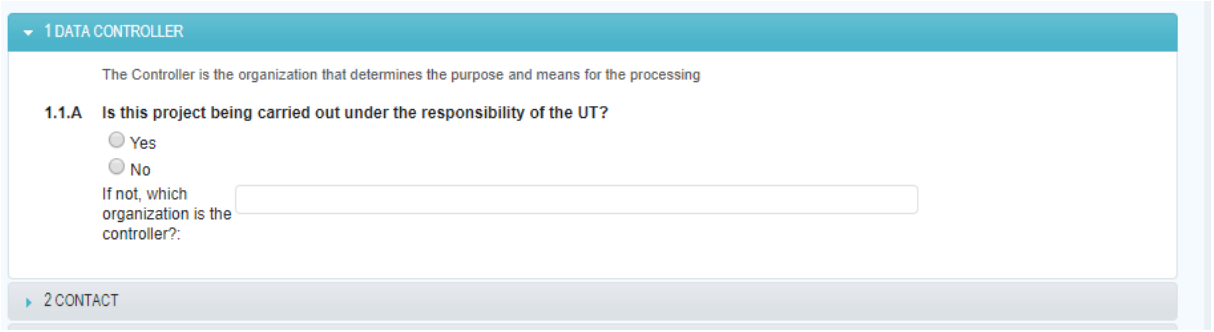
This manual should help you register your processing. By law the University has to have a register of all personal data processing. This tool provides the DPO-team the necessary overview.

1. Data Controller

Most of the processings for research are carried out under the responsibility of the UT. If you collect and process the personal data yourself or use the results for your own purposes, choose **Yes.**

If another party decides your purposes and tells you how to process the data, choose **No** and enter the **Name of the organization.**



2. Contact Information

Who should be contacted when the DPO has questions? This is most likely your own information or maybe your supervisors information. The contact person is always an employee of the UT.

3. Processor

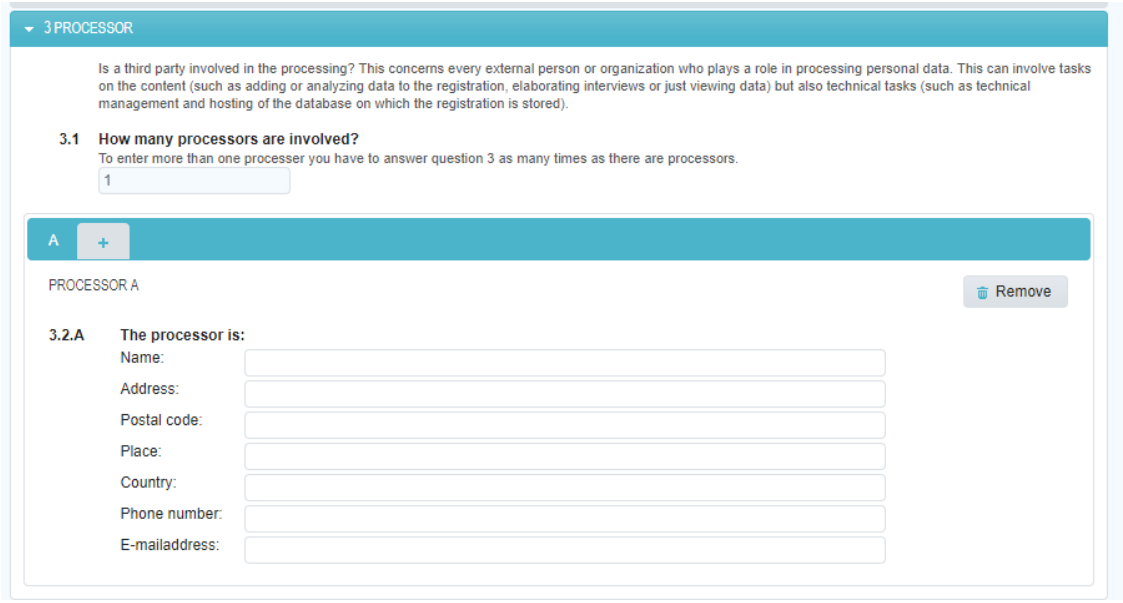
If there is a 3rd party involved, handling **on behalf of the UT**, then this 3rd party is a processor. This 3rd party can be a person (often Self-employed without employees) or another organization.

A processor is not a person or organization working with the data, so do not enter all project members here or all people that have access!

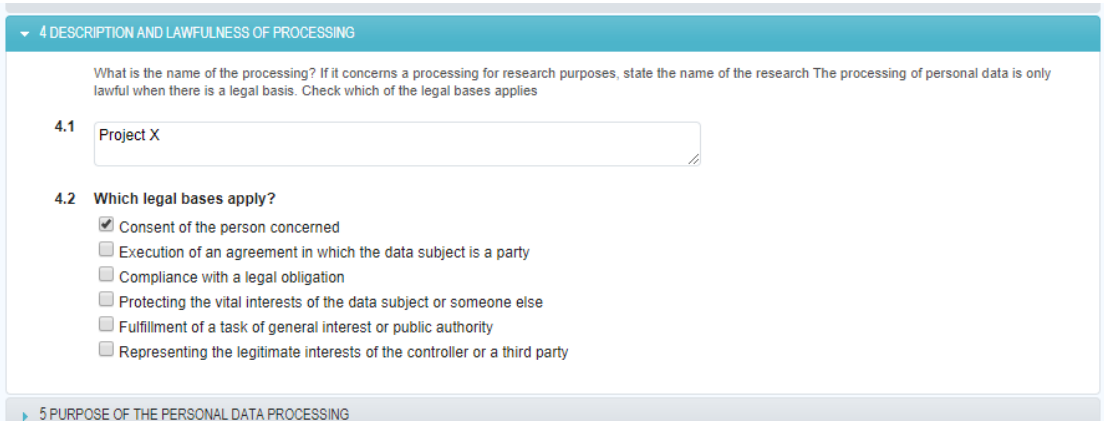
Example of processors are hosting providers, external (cloud) tools that are used in your project (for example surveys), etc.

This is often misunderstood, contact your PCP for more information when in doubt. **Most research projects don't have a processor!** Partners in your project (or their personnel) are most likely (co-)-controller and not processor.

If there is **no processor** click the **Remove** button (default number of processors = 1, removing the first (empty) entry sets the number of processors to 0). If you don't remove the processor the tool will warn you about mandatory fields when you save the information. At that moment it is still possible to remove the processor.



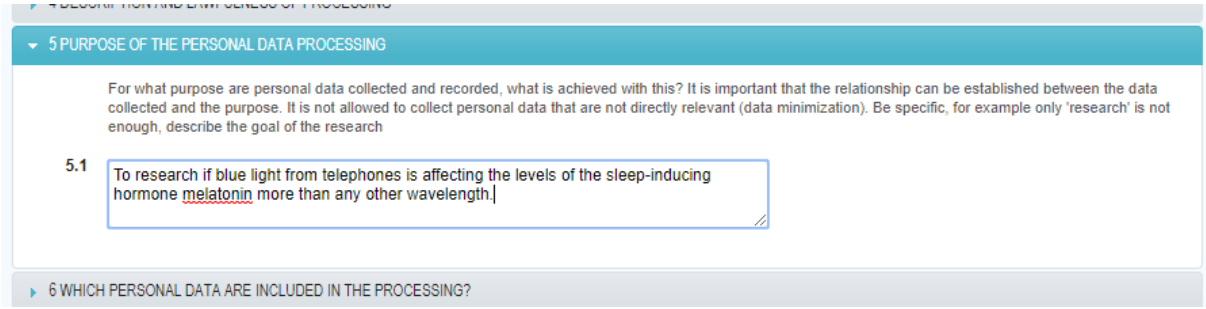
4 Description and lawfulness of processing



For the name of the processing the name of your project is sufficient. Give it a clear name that is easily recognizable and distinct, so 'research for my promotion' is not a useful name.

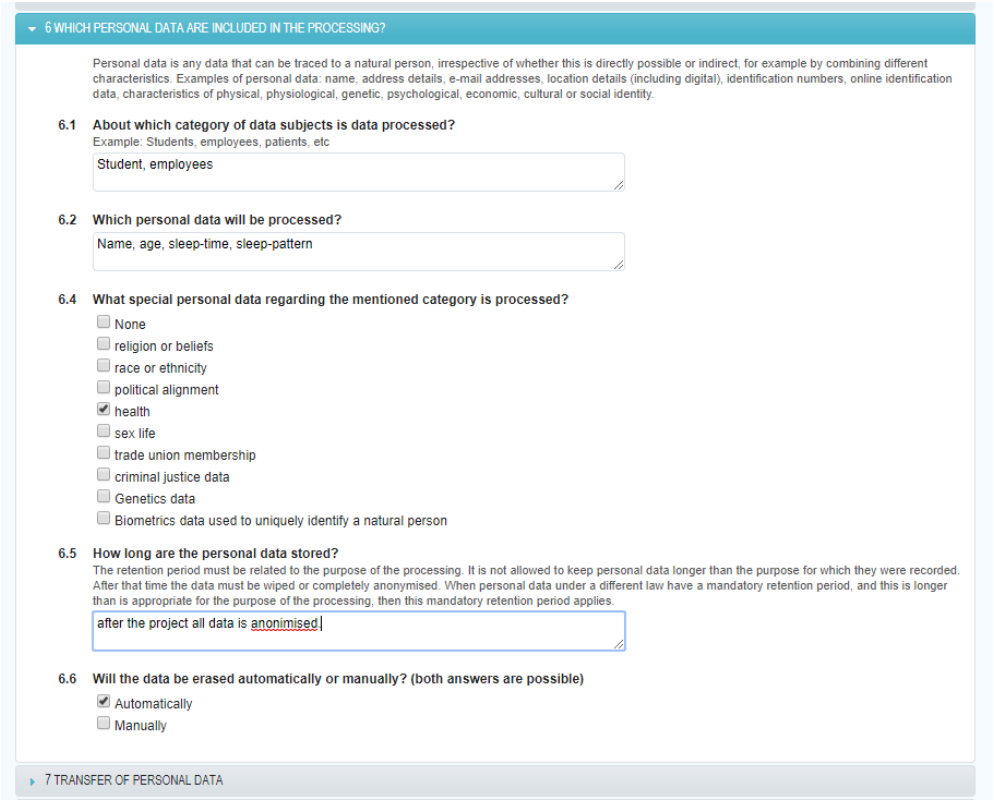
For research the **legal base** is often "Consent of the person concerned". If asking consent is a problem, contact your Privacy Contact Person.

5 Purpose of the personal data processing



State here what the purpose of the processing is and be concise**. It should be clear from the purpose why you need the specific personal data that you process**. If there is no relation between the purpose and the data you collect, the processing is unlawful. The data collected can only be used for the detailed purpose you state here. So 'Research' is too broad and by law not acceptable as a purpose.

6 Which personal data are included in the processing?

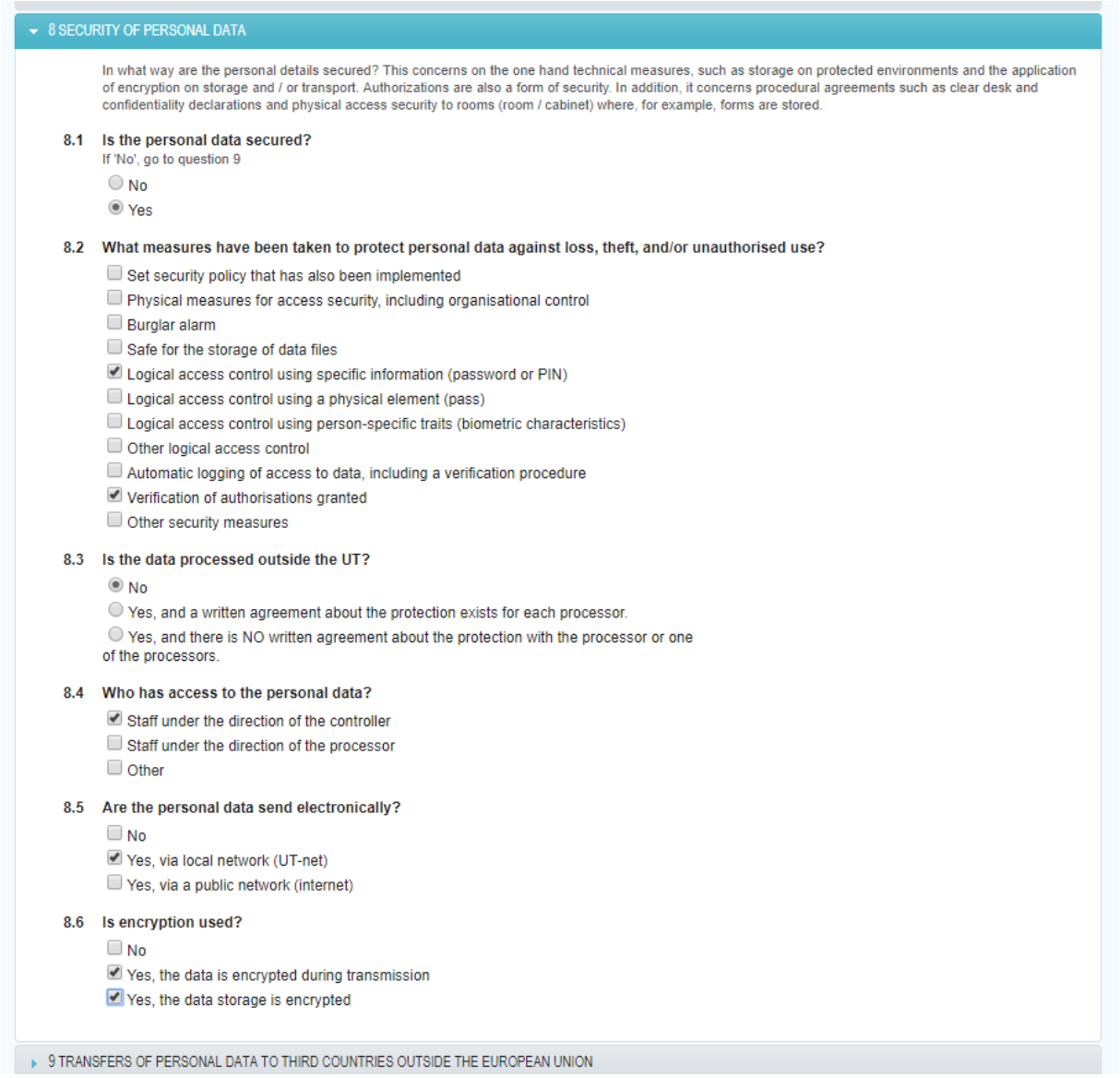


See the text in the application.

7 Transfer of personal data

Here you can enter the parties that use the data under your control. This is the processor (question 3) or any other party (for example the partners in the project) that uses the personal data. Statistical and anonymized data is outside the scope of the GDPR. The transfer of that kind of data should not be mentioned here.

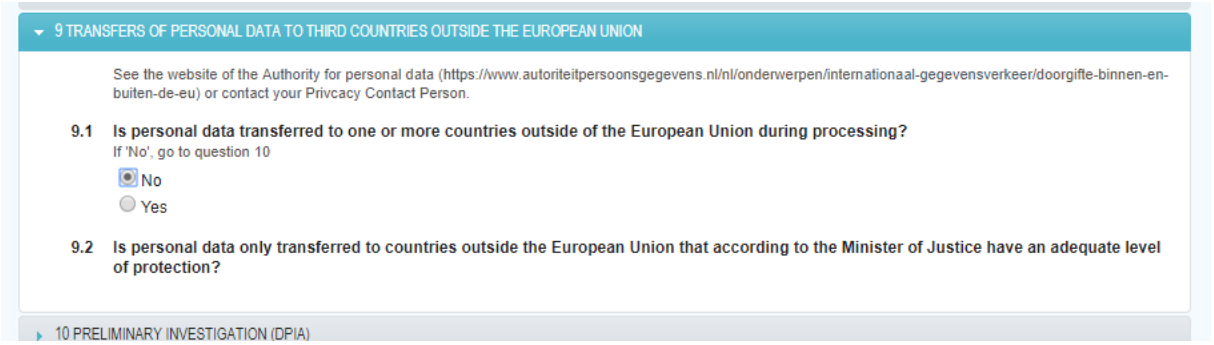
8 Security of personal data



The security of personal data is very important. You should address this in your **Data Management Plan** in detail (More information: https://www.utwente.nl/en/lisa/researchsupport/). To prevent you describing the security in detail twice, only some superficial questions are asked here.

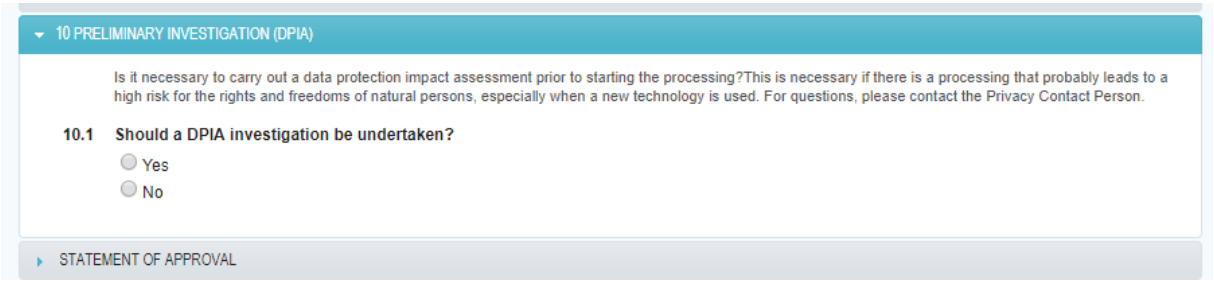
For High-risk projects (with respect to personal data) the PCP can help you with the Data Management Plan.

9 Transfers of personal data to third countries outside the European Union



The GDPR applies to the countries of the European Union. So transfers outside the European Union need extra safeguards (for example Privacy shield regulation for the United States). If you answer yes here you will probable need help from the Privacy Contact Person.

10 Preliminary Investigation (DPIA)



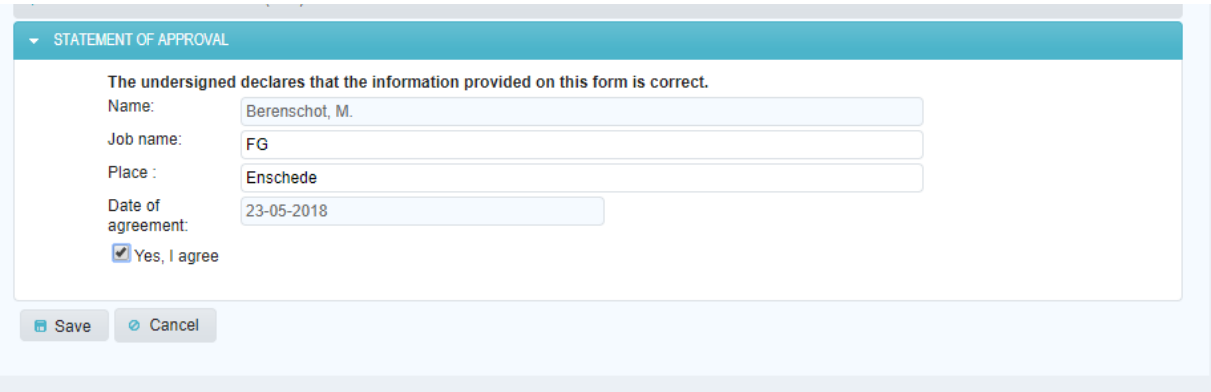
There are three criteria under which you will have to do a DPIA (data protection impact assessment).

- A systematical and extended judgement of personal aspects of a living person
- Large-scale processing of special personal data
- Systematic and large-scale monitoring of public space

In practice, this means that a formal privacy impact assessment won't be often needed. When a DPIA is necessary, or when you are in doubt about the necessity, contact the Privacy Contact Person of your faculty.

However, even if you don't have to do a DPIA, we advise you to do an inventory of risks, since this will bring to light which measures you can take to secure the personal data.

Statement of approval



When you are done, declare that you have provided correct information and click save. Your application will be forwarded to the DPO-team. When it is accepted by them you should receive an automated e-mail.

Thank you for registering your processing. If you have any suggestions or questions, contact your Privacy Contact Person.

See https://www.utwente.nl/privacy for more information.