Template for information letter for projects that will archive personal data

This is a template for an information letter if you plan to **archive personal data** after the project has been completed.

The template uses layered information, where the most important information is in the first part of the letter, and the rest comes in the second part. Note that **all information** must be included. You can choose whether you want to send/give the additional information as an attachment directly to the research participant or if you want to post it as a privacy statement on a website. By choosing the latter option, it may be easier for you to provide additional information in the future. Make sure to remember that the information must be kept updated over time.

Data protection legislation requires that the information is **concise and easy to understand**. We recommend that you use clear and simple language, which is tailored to the people who will read the information. Use headings, bullet points and avoid using complex words and concepts.

**Text in the template:**

|  |  |
| --- | --- |
| Blue text | Guidance to the template, the texts must be removed or adjusted. |
| Black text | Mandatory information, can be formulated differently, but not deleted |

Do you want to participate in

[insert project title]?

 **Purpose of the project**

You are invited to participate in a research project where the aim is to

* Insert the purpose of the project, briefly outline the issues / research questions
* Explain here that you will archive personal data for future use, and provide a brief explanation about what the purpose of this is and who will have access to the data later and what they can do with the data

**Why are you being asked to participate?**

You are being invited to participate because

* Briefly describe why you are contacting these people, how you have selected them and, if possible, how many others are being invited to participate, so that they understand why they are receiving the information letter.
* If applicable, explain that you have received the person's contact information from others (and any permissions you have obtained to do this), or that others have sent out the information on your behalf.

**Who is responsible for the research project?**

[Institution] is responsible for the personal data processed in the project.

* Write which institution is responsible for the processing of personal data (the data controller(s)). It is often the institution you are employed at/where you are studying. NB: this is the institution you have registered under "Data Controller" in the Notification Form.
* If applicable, name other collaborating institutions, or an institution that has commissioned the research.
* If you are going to transfer data to an archive after the end of the project, state this here and describe who is then responsible for the personal data (still your institution, or responsibility transferred to the archive)

**Participation is voluntary**

It is voluntary to participate in the research project. If relevant: You can choose to participate in the research project, but opt-out of the personal data being archived for further research.

**What does your participation entail?**

Describe:

* Which method(s) you will use for data collection (e.g., questionnaire, interview, observation) and what the scope of data collection is,
* Which personal data will be collected (e.g. name and contact information, background information, any special (sensitive) categories of personal data)
* How the data is registered (e.g. electronically, notes, audio/video recording)
* Describe whether you are going to collect data from other sources, such as data registries, medical records, student records, or from other people,
* If you are going to collect data from children: explain that parents can request to see the questionnaire/interview guide in advance

**What does archiving entail?**

* State which data/which personal data will be archived (names/ID, or only indirectly identifiable data?)
* Describe the time frame: permanent/indefinite, or time-limited?

**Brief information about data protection**We will only use data about you for the purposes described in this letter. We will process personal data confidentially and in accordance with data protection legislation. You can read more about data protection below\*.

Sincerely,

Project Leader

(Researcher)

\*If electronic information:

• You can read more about privacy by clicking the button below.

\*If information in paper format:

• You can read more about privacy on the next page/below.

**READ MORE (additional information that must also be included in the letter):

Data protection - how we store and use your personal data**

* Describe who will have access to the personal data during the project period (e.g., the project group at the data controller(s), student and supervisor, only employees of the data controller, also external researchers at collaborating institutions, etc.).
* Provide information about who will have access to the personal data when the project enters the archiving phase, and with whom the archived personal data may be shared (all, or limited to institutions that conduct research, limited to a Norway/Europe?)
* Describe which type of personal data it will be relevant to share/disseminate
* Describe the measures you will take to ensure that no unauthorized persons gain access to the personal data, e.g. "Your name and contact details will be replaced with a code that is stored on a list of names separate from other data", your store the collected data on a research server, locked/encrypted, etc.).
* Describe whether the participants will be recognizable in publications or not, and, if applicable, which types of personal data will be published (e.g. name, age, occupation etc.).

If relevant, add:

* The name of any data processor you will use to collect, work with, store personal data, e.g. transcription service or online survey provider,
* That people at other institutions will be given access to the collected personal data; name the institutions, outline the number of people, specify the type of data they will have access to,
* That personal data will be processed outside the EU (e.g. fieldwork, analysis, cloud service); name the institution and country, and describe security measures.

 **What gives us the right to process data about you?**

We will process your personal data for research in the public interest.

On behalf of [insert institution responsible (data controller)], Data Protection Services at Sikt - Norwegian Agency for Shared Services in Education and Research, have assessed that the processing of personal data in this project is in accordance with the privacy regulations.

**Your rights**So long as you can be identified in the collected data, you have the right to request access to the data we are processing about you, to request that the data is corrected or deleted, and to object to the processing. You will hear from us within a month. We will provide an explanation if we cannot identify you or if your rights cannot be exercised. You also have the right to lodge a complaint with the Data Protection Authority about how we are processing your data.

**Data archiving**

The project is expected to end [approximate end date of the project]. The collected personal data will then be [archived/stored for future use]. Note that “personal data” is all data that can be linked back to individual people.

* Describe why the collected personal data will be stored (for example for further research purposes (in the same field), educational purposes, or verifiability and replication purposes).
* Where the personal data will be stored (e.g. at the same institution, or at a research archive, and which institution will be responsible for the archived data). Note that it is only data that can be shared with others outside the research group that can be archived at Sikt.
* Which data will be stored (entire data set, with names and contact details, or only indirectly identifiable data, sound recordings/video recordings, etc.).
* Who can access the personal data (e.g. students and other researchers) and which data they can access.
* How long the personal data will be stored (provide an approximate date for anonymisation, or, if applicable, specify that the personal data will be stored indefinitely).
* Note that if you are going to store personal data for teaching purposes, it may be necessary to base this on consent as a legal basis.

**Questions**

If you have questions or want to exercise your rights, please contact:

* [Insert name and contact details of project manager]
* Our Data Protection Officer: [insert contact details for the data protection officer for the data controller].
* If the responsibility changes at the time of archiving/storage, you must also inform about the institution that can be contacted then

If you have questions about how Data Protection Services have assessed the project, you can contact them by email: personverntjenester@sikt.no, or by phone: 73 98 40 40.