

**Office of Research Administration  
Privacy Notice for Information and Sensitive Information  
Covered by the European Union's  
General Data Privacy Regulation (GDPR)**

The Office of Research Administration at Brandeis University (ORA) is committed to safeguarding the privacy of personal data. This Privacy Notice outlines the collection, use, and disclosure of personal information provided to ORA by postdoctoral scholars and visiting scholars and/or to human-subjects research investigators (research investigators) by research subjects. When you submit information to ORA, or to research investigators, you consent to the collection, use, and disclosure of that information as described in this Privacy Notice.

**University Use of Information**

ORA may collect and process Information and Sensitive Information from postdoctoral scholars and visiting scholars for the purpose of processing University appointments concerning those individuals. Research investigators may collect and process Information and Sensitive Information from research subjects in the exercise of scientific research, under protocols approved by the Brandeis University Institutional Review Board (IRB).

For purposes of this Privacy Notice, Information refers to any information concerning any identifiable individual (any 'natural person') that is created by, or provided to, ORA concerning postdoctoral or visiting scholars, or to research investigators from research subjects.

For purposes of this Privacy Notice, Sensitive Information is defined as race, ethnic origin, religious or philosophical beliefs, health data, sexual orientation, and criminal convictions.

**Third Party Use of Sensitive Information**

We may disclose your Sensitive Information and other Information as follows:

- **Consent:** We may disclose Sensitive Information and other Information if we have your consent to do so.
- **Emergency Circumstances:** We may share your Information and Sensitive Information when necessary to protect your interests and you are physically or legally incapable of providing consent.
- **Public Information:** We may share your Information and Sensitive Information if you have manifestly made it public.
- **Archiving:** We may share your Information and Sensitive Information for archiving purposes in the public interest, for historical research, and statistical purposes.
- **Performance of a Contract:** We may share your Information when necessary to administer a contract you have with the University.
- **Legal Obligation:** We may share your Information when the disclosure is required or permitted by international, federal, and state laws and regulations.
- **De-Identified and Aggregate Information:** We may use and disclose Information in de-identified or aggregate form without limitation.

## **Security**

We will implement appropriate technical and organizational security measures to protect your information when you transmit it to us and when we store it on our information technology systems.

## **Retention and Destruction of Your Information**

Your information will be retained by ORA or by research investigators in accordance with applicable state and federal laws. Your information will be destroyed upon your request unless applicable law requires destruction after the expiration of an applicable retention period. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your information given the level of sensitivity, value, and criticality to ORA or the research.

## **Your Rights**

You have the right to request access to, a copy of, rectification, restriction in the use of, or erasure of your information in accordance with all applicable laws. The erasure of your information shall be subject to the retention periods of applicable state and federal laws. If you have provided consent to the use of your information, you have the right to withdraw consent without affecting the lawfulness of the ORA's and/or research investigator's use of the information prior to receipt of your request.

Postdoctoral scholars and visiting scholars may exercise these rights by contacting the Office of Research Administration, Postdoctoral Services at [postdoc@brandeis.edu](mailto:postdoc@brandeis.edu). Research subjects may exercise these rights by contacting Brandeis University's Institutional Review Board (IRB) at [irb@brandeis.edu](mailto:irb@brandeis.edu).

Information and/or Sensitive Information created in the European Union may be transferred out of the European Union to the University. If you feel the University has not complied with applicable foreign laws regulating such information, you have the right to file a complaint with the appropriate supervisory authority in the European Union.

## **Updates to This Notice**

We may update or change this notice at any time. Your continued use of the ORA's website and third party applications after any such change indicates your acceptance of these changes.

*Last updated: 24 May 2018*