

HEBREW UNIVERSITY PRIVACY NOTICE

This privacy notice provides information on how The Hebrew University collects and uses your personal information when you take part in one of our research projects. It is important that you read this privacy notice together with the Participant Informed Consent Information Sheet (“**Information Sheet**”) for the study in which you are taking part.

The Information Sheet will explain the purpose of the project and contain more specific details about what information will be collected about you and how it will be used to achieve the project’s objectives.

By submitting (or authorising such submission) of Personal Information (see definition below) to the Hebrew University for use by researchers, you consent to the collection, use, processing, and disclosure of that information as described in this Privacy Notice.

For the purpose of this Privacy Notice, **Personal Information** includes Personal Data and Sensitive Data, as discussed below.

1. General Information

Your Personal Information will be treated in compliance with applicable data protection laws.

The Hebrew University is the ‘**Data Controller**’ when it manages research projects, which means that we are responsible for looking after your Personal Information and using it properly for that project.

Where we work together with other Data Controllers (such as other Universities or research partners) on a research project, this will be made clear in the Information Sheet provided to you, along with information about how we have agreed to share our responsibilities for handling your data.

If you have any further questions about the research collaborations for the project you are taking part in, please contact the project’s research team using the contact details on the Information Sheet.

2. How and for what purpose Personal Information will be collected

Information for this research is collected in the exercise of scientific, historical research, or statistical purposes only as necessary in the exercise of the University's legitimate interests, functions and responsibilities as a public research higher education institution.

We will collect and obtain Personal Information directly from you and/or from other sources as shall be indicated in the Information Sheet (including for example, repositories, collaborators, social media, publicly available sources, etc.) so we can properly conduct this research. As we conduct research procedures with your Personal Information, new study data may be created. The research team may collect and use Personal Information which may include some of the following types of Personal Information according to the research needs and as detailed in the Information Sheet:

- Contact Information (including, without limitation, name, email address, physical address, phone number, and other location data)
- ID number, driver’s license numbers, IP address, and other unique personal identifiers and biographical information (e.g. date of birth)
- Photographs/videos/audio of you
- Details of your education and/or employment qualifications
- Behavioral Information
- **Race, ethnicity**

- Health information
- Your racial or ethnic origin
- Your political opinions
- Your religious or philosophical beliefs
- Your sexual orientation or beliefs
- Genetic data
- Biometric data
- Trade Union membership
- Information about your response to the research procedures

Any additional data shall be detailed in the Information Sheet. Please note that the categories marked in red are considered “Sensitive Data”

3. What safeguards do we have in place to protect your Personal Information?

All Personal Information is handled according to the University’s policies in line with legal and regulatory requirements.

We expect all our staff and students to respect the confidentiality and sensitivity of the Personal Information they use for their research projects from whatever source, whether provided by you, as a participant in our research, or whether received or shared from other organisations.

In order to protect your rights and freedoms when using your Personal Information for research purposes, the University will not do anything with your Personal Information that you would not reasonably expect.

We will use your personal information only for achieving the objectives of the research you are participating in and we will not usually use your information further or contact you for any purpose other than this research unless you have agreed to this or de-identification processes are applied to your data.

We also have the following technical, legal, and organisational safeguards in place to help protect your Personal Information:

- Policies and procedures that our staff and students must follow to collect and use your information safely.
- Security standards and technical measures that ensure your information is stored safely and securely.
- All research projects involving Personal Data are reviewed and approved by a research ethics committee to ensure the research does not expose you to undue risk or cause you distress (e.g., physical harm, financial loss or psychological distress).
- The University will carry out data protection impact assessments on high risk projects to ensure that your privacy, rights as an individual, or freedoms, are not affected.
- If we use collaborators outside of the European Economic Area, we will ensure that they have adequate data protection laws, or are part of privacy and security schemes (such as the Privacy Shield self-certification programme in the US).

4. With whom will my Personal Information be shared?

The following categories of individuals and/or third parties may receive Personal Information collected or created about you depending on the research needs:

- Members of the research team so they properly conduct the research, identify you as a participant and contact you about the research project.
- Responsible members of the Hebrew University may also be given access to Personal Information used in a research project for monitoring purposes, maintenance and support, and/or to carry out an audit of the study to ensure that the research is complying with applicable regulations.
- The research Sponsor who will monitor the study and analyse the data
- Agents of the Sponsor who will assist the sponsor with data monitoring and analysis
- Other research collaborators, so they can perform procedures required by this research
- Other researchers, including researchers in other countries, so they can conduct additional research as permitted in the consent forms; and
- Any additional categories of individuals shall be included in the Information Sheet

The Hebrew University is located in Israel but may collaborate, for the purpose of research, with research institutions and/or researchers in other countries including for example in territories in the European Economic Area (“EEA”). Therefore, for the purpose of the research, Personal Information may be transferred from Israel to the EEA and/or any territory or territories that have an adequate level of protection under Article 45 of the GDPR (“**Territories**”), and from any of the Territories to Israel.

Depending on the project, the research team may transfer your Personal Information to a research site that does not have the same laws to protect your Personal Information as for example in the EU/EEA or Israel. However, the research team is committed to protecting the confidentiality of your Personal Information. Additional information about the protections we will use is included in the Information Sheet.

We may also have to disclose your Personal Information if required to do so by law in order to comply with a legal obligation, to protect our rights, interests or property and those of others, to act in urgent circumstances to protect the personal safety of our staff, students and the public or to protect us against any legal liability.

Information shared will be on a ‘need to know’ basis relative to achieving the research project’s objectives, and with all appropriate safeguards in place to ensure the security of your Personal Information.

We may use third parties who have entered into a contract with the University to conduct outsourced research services or to support the administration of University operations and policies. In such cases, we share your Personal Information with such third parties subject to the imposition of appropriate safeguards to prevent further unauthorised disclosure.

5. For how long your Personal Information will be kept

After the research ends, we will keep your Personal Information for the period specified in the Information Sheet and then it will be destroyed.

6. Your rights

Your rights relating to Personal Information include:

- To be informed (via this privacy notice and other communications);
- To request access to Personal Information held by the University (and if/when feasible, to receive this information in a structured, commonly used and machine-readable format);

- To have incorrect Personal Information rectified;
- Restrict or object to our processing of information (where appropriate);
- Your right to have Personal Information erased (where appropriate);

Where Personal Information is processed as part of a research project, the extent to which these rights apply varies under the applicable laws (for example, the GDPR). In particular, your rights to access, change, or move your information may be limited, as we need to manage your information in specific ways in order for the research to be reliable and accurate.

If you withdraw from the study, we may not be able to remove the information that we have already obtained. In some research projects, it **may not** be possible to provide these rights because doing so would prevent or seriously impair the achievement of the research purpose. For instance, if you are participating in a focus group with multiple participants, if the research has progressed to a later stage of analysis, or findings have been published, it may not be possible to remove any one individual's personal data without having an adverse effect on the entire dataset.

To note, where the University is no longer in a position to identify you from the information we hold, it will not be possible for the University to implement your rights following a request about such information. In particular, once data collected as part of a research project have been irreversibly anonymised, it will no longer be possible to identify what data we hold about you specifically.

None of the above precludes your right to withdraw consent from participating in the research study at any time.

7. Who can you contact?

In the first instance, if you have any questions about how your Personal Information is being used in a specific study, you should contact a member of the study team as detailed in the Information Sheet.

The Hebrew University Data Protection Officer is Mr. Roy Azrad. You can contact the Data Protection Officer by email at privacy@huji.ac.il if you have:

- Questions about this Privacy Notice
- Complaints about the use of your Personal Information
- If you want to make a request relating to the rights listed above.