

Fakultetsstyrelsen

Guidelines for the processing of personal data in student projects at Lund University School of Economics and Management

What are personal data and sensitive personal data?

Personal data is defined as: *Any information relating to an identified or identifiable physical person (often referred to as the registered person or data subject) who is alive. Simply put, it refers to information through which a person can be directly or indirectly identified. Examples of information that typically function as identifiers include: a name, a photograph, an address, an email address, a personal identification or coordination number, or location data. Other examples are factors specific to a person's physical, psychological, economic, cultural, or social identity.*

Sensitive personal data are those that reveal; race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; processing of genetic and biometric data which uniquely identify a physical person (that is, data obtained through digital processing of, for instance, a photograph, voice, or fingerprint that facilitates or confirms the identification of a physical person), and data concerning health or a physical person's sex life or sexual orientation.

When is it allowed to process personal data?

According to the General Data Protection Regulation (GDPR), the processing of personal data may only take place if it is based on several legal grounds (consent, agreement, balance of interest, legal obligation, exercise of official authority, and in public interest and fundamental interest). The University processes personal data in and for the university's mission as an education provider and research institution, and in connection with collaboration with the rest of society.

Personal data may be processed in connection with student projects.

Lund University is responsible for the processing of personal data carried out by students as part of their studies. This means that the institution can only collect and process an individual's personal data if there is a basis for the processing in GDPR. In the case of personal data in student projects, Lund University usually finds that the legal basis is the public interest. Sensitive personal data may only be processed if explicit consent has been obtained.

Processing of personal data

Processing personal data is often necessary to meet degree and learning objectives in social science methodology and analysis.

The processing of personal data should be carried out with caution, and the institution is responsible for ensuring, for example, that data storage is done securely, and that the information is not disseminated. Personal data should not be stored longer than necessary and should be deleted when they are no longer needed.

The processing of personal data must comply with the basic principles set out in the GDPR:

- The data should be processed in a lawful, fair, and transparent manner concerning the data subject.
- The data should be collected for specific, explicitly stated, and legitimate purposes.
- The data should be adequate, relevant, and not excessive in scope in relation to the purposes for which they are processed.
- The data should be accurate.
the data should be processed in a way that ensures appropriate security of the personal data.

When is processing personal data in student projects motivated

- If the learning outcomes for a specific student project can be met without collecting personal data, then personal data should not be collected. If the student does not collect any information that can directly or indirectly identify an individual, the information is not considered personal data, and GDPR does not apply. Entirely anonymous written data - where names were not collected at the time of, or during the interview - are generally not considered personal data.
- If a teacher determines that data linking information to a specific individual is necessary to answer the questions in the student project and thus meet the learning objectives, personal data may be collected. This applies to information such as a name, address, email address, personal identification- or coordination number, or information about a person's physical, psychological, economic, cultural, or social identity that can identify the individual in question. A recording of an individual's voice is considered personal data.

Guidelines for processing personal data in student projects

- In cases where personal data, such as names or other information that can reveal an individual's identity, are necessary to meet the learning objectives, the basic principles above must be met. In practice, this means that informed consent must be obtained from respondents, that data containing personal data may only be used in connection with the student project, and that the personal data should then be deleted. The identity of the people should not be revealed in the final student project, except in cases where consent has been obtained. Obtaining consent is preferably done using the form provided by the Academic Skills Services at Lund University School of Economics and Management.
- In general, written consent should be obtained for the processing of sensitive personal data. In some cases, such as data collection in authoritarian regimes or for certain groups, it is directly inappropriate to request written consent, and the student should document in the student project how verbal consent was obtained without revealing the identity of those whose personal data were processed.
- For the processing of personal data related to public figures, such as politicians and influencers, through accounts on social media, for instance, there is an exception from the prohibition of processing personal data, provided that the person has made them public themselves. In cases where possible, the student

should inform the concerned person that the data will be used in connection with a student project.

- Analysis of personal data consisting of published image materials from the daily press does not require that students inform the people photographed.
- Personal data published by the public on social media may not be processed without explicit consent.
- Personal data collected in connection with student projects may not be shared with others, used for other purposes, or stored after the student project has been examined with a passing grade.
- Students may not film people in connection with student projects without obtaining explicit consent.
- If students collect data through surveys, Sunet Survey should be used. Sensitive personal data may not be collected via surveys. This does not apply when theses are written on behalf of other government authorities (see below).
- Analysis of secondary data in existing national and international databases is not considered personal data processing.
- External cloud services, such as Google Drive, iCloud, and Dropbox, may not be used for processing or storing personal data. This also applies to Lund University's OneDrive.
- If personal data is stored locally, such as in the file system of a computer or a mobile phone, the device must be password-protected.
- Collected data should be deleted when the student project has been examined with a passing grade.

Degree projects or internship tasks on behalf of other government authorities

In cases where theses or internship tasks are written on behalf of other authorities, it is the responsibility of the commissioning authority to ensure sufficient confidentiality vis-à-vis the students since Lund University is in that case not responsible for data protection. The relevant government authority should provide data in such a way that they do not leave the authority and thus do not come into the hands of the university. It could mean making statistics from its sources available or organizing the writing in such a way that no data is transferred, for example, by providing the student with a local access to the data on-site at the location of the government authority. This also applies when students undertaking internships or other courses outside the university.

Do student projects need to be subjected to ethical review?

The guidelines only apply to student projects and practical tasks that do not fall under the Ethical Review Act (2003:460). The Ethical Review Act (2003:460) is not applicable to studies conducted as a part of education at the first- or second cycle levels unless the data is to be used for research purposes.

Therefore, publishing the results in scientific outlets such as journals, requires the project to have undergone ethical review and been approved before data collection begins.