

SAMPLE NOTIFICATION FORM TO BE SUBMITTED TO THE DPO WHEN SEEKING DATA  
PROTECTION CLEARANCE IN THE CONTEXT OF AN ETHICS REVIEW

<b>REFERENCE:</b>	
<b>Title: [Please insert the reference number and the title of the project.]</b>	
<b>1. Processing</b>	
<b>1.1 Name of the Data Controller</b>	[Please insert the name of the researcher/principal investigator who determines the purposes and means of the processing of personal data.]
<b>1.2 Name of the Processor(s)</b>	[Please indicate the names of any other natural or legal person that may process the data. If processors can be categorised into groups please refer to them by groups and not necessarily by name, otherwise indicate their names.]
<b>1.3 Lawfulness of Processing</b>	[You must process only those personal data that are necessary for your research. Processing personal data that are not essential to your research may even expose you to allegations of 'hidden objectives', i.e. processing information with the data subjects' permission for one purpose and then use that information for another purpose, without specific permission.]
<b>1.4 Description of the processing operations (i.e. what you do with personal data and how)</b>	<p>['Processing of personal data' means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as:</p> <ul style="list-style-type: none"> <li>• Collection (digital audio recording, digital video caption, etc.)</li> <li>• Recording</li> <li>• Organisation and storage (cloud, LAN or WAN servers)</li> <li>• Adaptation or alteration (merging sets, amplification, etc.)</li> <li>• Retrieval and consultation</li> <li>• Use</li> <li>• Disclosure, transmission, dissemination or otherwise making available (share, exchange, transfer, access to the data by a third party)</li> <li>• Alignment or combination</li> <li>• Blocking, deleting or destruction, etc.</li> </ul> <p>Please describe in detail the processing operations that you will perform for conducting your research and give detailed feedback on participants. Indicate also if a copy of notification/authorisation for tracking or observation is required.</p> <p>Any type of research activity may involve processing of personal data (ICT research, genetic sample collection, research activities involving personal records (financial, criminal, education, etc.), lifestyle and health information, family histories, physical characteristics, gender and ethnic background, location tracking and domicile information, etc.)] any method used for tracking or observing</p>
<b>1.5 Categories of Data Subjects</b>	[Please indicate the categories of data subjects involved in the processing operations of the project.]
<b>1.6 Categories of personal data</b>	<p>[Please list concretely the categories of personal data that you will process:</p> <p style="padding-left: 20px;">personal data: name, home address, e-mail address, location data etc.</p> <p style="padding-left: 20px;">sensitive data: religious beliefs, political opinions, medical data, sexual identity, etc.</p>

	secondary use of data: you must specify if you will process data that were previously collected for another purpose as well as how you will ensure their lawful processing.]
<b>1.7 Rights of data subjects</b>	<p>[Article 16 of the EU's DP Policy  <i>Data subjects enjoy the following rights concerning their personal data:</i></p> <p>a) <i>to be informed whether, how, by whom and for which purpose they are processed</i>  b) <i>to ask for their rectification, in case they are inaccurate or incomplete</i>  c) <i>to demand their erasure in case the processing is un lawful or no longer lawful ('right to be forgotten')</i>  d) <i>to block their further processing whilst the conditions under letters b) and c) of this Article are verified.</i></p> <p>Please indicate how you will ensure the data subjects' rights.  E.g. participants will be free to withdraw at any time without justification. The data collected prior to the withdrawal will be deleted. In such a case, you may need to ensure the erasure of the collected data while maintaining anonymity. In order to do so, you may use a pseudonym for each participant ensuring that the key to the pseudonyms is password-protected and available only to the data controller.]</p>
<b>2. Detailed procedures</b>	
<b>2.1 Details on the procedures that you will use to identify/recruit research participants.</b>	<p>[A few examples:</p> <ul style="list-style-type: none"> <li>• consultative process involving a gatekeeper (e.g. NGOs providing support to the participants)</li> <li>• snowballing (through referral from one participant to another)</li> <li>• personal contacts (obtained by the researcher from the contextual knowledge of the country and place where the research is conducted) etc.]</li> </ul>
<b>2.2 Details on the procedures for obtaining informed consent</b>	<p>[Please give details on the procedures for obtaining informed consent from the data subjects (e.g. providing an information sheet together with the consent form).  In case of children/minors and/or adults unable to give informed consent, indicate the tailored methods used to obtain consent.  According to the H2020 Guidelines, if the data subjects are unable to give consent in writing, for example because of illiteracy, the nonwritten consent must be formally documented and independently witnessed.  Please explain how you intend to document oral consent. In the very exceptional case that it can't be recorded please give reasons.  If you will use deception for another type of data subjects, you must obtain retrospective informed and free consent as well as debrief the participants.  Deception requires strong justification and appropriate assessment of the impact and the risk incurred by both researchers and participants.]</p>
<b>2.3 Measures taken to prevent the risk of enhancing vulnerability/stigmatisation of individuals/groups</b>	[Please indicate any such protective measures (e.g. use of anonymisation techniques, use of pseudonyms, non-disclosure of audio-visual materials, voice records, etc.)]
<b>2.4 Safeguards taken to protect the data subjects' identity.</b>	[Article 2 of the EU's DP Policy Identifiable persons can be identified directly or indirectly, in particular by reference to an identification number or to one or more

	<p>factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity.</p> <p>Please provide details on the measures taken to avoid direct or indirect identification of the data subjects, e.g. by using anonymisation techniques or pseudonyms.</p> <p>E.g. names of the data subjects will not be disclosed, at any time, in audio recording and published material.</p> <p>Pseudonyms (a reversible system of coding in order to be able to recontact participants if needed) will be used in all documentation, and any additional information that may reveal the identity of participants will be concealed when publishing.</p> <p>Destroy any residual information that could lead to the identification of participants at the end of the project. You must explain this procedure clearly to participants during the 'recruitment' process].</p>
<p><b>3. Technical and organizational security measures (Data Security)</b></p> <p><b>You need to work out and clearly define a secure access policy. It must be proportional to the risks involved and to the sensitivity of the data. Please state clearly the type of security measures – such as password protection, encryption, 'need to know basis' principles (i.e. only the users that need to access the data will be allowed to do so), - that you will implement.</b></p>	
<p><b>3.1 Storage medium</b></p>	<p>[Please indicate any methods considered for data storage.</p> <p>E.g.: You will identify each transcription by a pseudonym whilst you will store the data subjects' names in a separate file to ensure security. You will password-protect all of these files. You will store data collected in a secure database at the EUI, to which only the project team members will have access, in order to prevent any unauthorised access and possible misuse (e.g. data mining, profiling).</p> <p>E.g.: Temporary storage (on site): The transcribed interviews and field observations will be stored electronically and passwordprotected. The researcher will make regular back-up copies of these files, which will be stored offline on the hard</p>
<p><b>3.2 Retention Period</b></p>	<p>[Article 4 of EU's DP Policy</p> <p>Personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which they were collected or for which they are further processed.</p> <p>Please indicate how you will comply with this requirement by establishing the exact retention period as well as the measures that you will implement to delete the data.]</p>
<p><b>4. Data Transfer</b></p>	
<p><b>4.1 Within the Montenegro</b></p>	<p>- Will you transfer any personal data to recipients inside the Montenegro? To whom (person(s) or category of person(s)/legal entities) &amp; for what purpose will you transfer the data</p>
<p><b>4.2 Within the EUI</b></p>	<p>- Will you transfer any personal data to recipients inside the EUI? To whom (person(s) or category of person(s)/legal entities) &amp; for what purpose will you transfer the data</p>
<p><b>4.3 Inside the EU/EEA</b></p>	<p>- Will you transfer any personal data to third parties inside the EU/EEA area? To whom (person(s) or category of person(s)/legal entities) &amp; for what purpose will you transfer the data?</p>
<p><b>4.4 Outside the EU/EEA</b></p>	<p>- Will you transfer any personal data to third parties outside the EU/EEA area? How will you ensure that the third party has in place adequate safeguards for the protection of personal data (e.g. adequacy decision adopted by the European Commission?)?</p>
<p><b>5. Complementary information</b></p>	<p>If necessary</p>