



Finding better ways to support student wellbeing

Internet CBT Privacy and Personal Data Protection Policy

TITLE: Internet-based cognitive-behavioural therapy for acute depression and anxiety in UK university students

How does the University of Exeter use Personally Identifiable Data for research?

In order to conduct world class research, University of Exeter sometimes needs to collect Personally Identifiable Information (including names, contact details). If you take part in some types of research, like Clinical Trials, some of the research team will need to contact you about appointments or questionnaires. However, we must make sure that as few people as possible can see this sort of information. Most of the research team will not know your name and for the most part your information will be pseudonymised – that means we have replaced your name with a code to link it with the information you give us.

Universities use patient and participant data to do research to make health and care better, but we have to ensure it is in the public interest to process your data. This is because we are publicly funded. Any data you provide will be processed in accordance with UK data protection law including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Who is responsible for looking after my personal data?

The University of Exeter is the Sponsor for this study based in the United Kingdom. We will be using information from you in order to undertake this research and will act as the data controller for this study. This means we are responsible for looking after your information and using it properly.

What is the legal basis for the processing of my data?

The University will process your personally identifiable data for the purpose of the research. This will be specified by the participant information sheet you are given as part of the informed consent process. The legal basis for processing your personally identifiable data for research purposes, under UK data protection law, is 'public task'.

Researchers also have a common law duty and ethical obligation to gain explicit informed consent from you as a research participant for all aspects of the research. This includes the use of your personal data.

What are my legal rights as a research participant?

You have the right to be informed of the following:

- What data we collect from you.
- How we will ensure the confidentiality of your data.
- How long we will keep your data for, and whether it will be shared with anyone else.

For further information see <https://www.exeter.ac.uk/about/oursite/dataprotection/rights/> (note these rights apply only when data is identifiable). Under UK data protection law, you have the right of access to any information we hold about you. You can ask for it to be corrected, erased, and object to how it is processed. However, this might be restricted in some circumstances. These circumstances include compliance with legal and regulatory obligations. Restrictions might also be applied for scientific research purposes. For example, this might be if the deletion of your data was seriously detrimental to the research.

In such circumstances, we may need to keep the information about you that we have already collected. Your rights to access, change, or move your personal information may be limited, as we need to manage your information in specific ways for the research to be reliable and accurate. If you withdraw from the study, we will keep the information about you that we have already obtained. To safeguard your rights, we will use the minimally required Personal Identifiable Data possible.

We may share anonymised data for future research, here or abroad, which has ethical approval.

However, the research team are required, under UK data protection law, to explain why these restrictions might be necessary before you agree to take part in the study. This is part of the informed consent process.

Your Right to complain

At any time, you are entitled to file a complaint to the Data Protection Officer at the University of Exeter about our processing of your personal data. The contact details are here: <https://www.exeter.ac.uk/about/oursite/dataprotection/dpo/>

Information Governance Manager and Data Protection Officer

The University of Exeter, Compliance, Governance and Risk
c/o Northcote House, The Queen's Drive, Exeter EX4 4QJ
Email: Informationgovernance@exeter.ac.uk Tel: 01392 726842

If you are not satisfied with our response or believe we are processing your personal data in a way that is not lawful you can complain to the Information Commissioner's Office (ICO) www.ico.org.uk