

# General Privacy Notice for Research Participants

## Document Control

### Document Information

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<b>Approver</b>	Management Committee
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### Version History

Version	Date	Summary of Changes
0.1	03/05/2024	Initial draft prepared by Data Privacy Manager, with support from Assistant Director, Research Support - Research & Faculty
0.2	10/06/2024	Reviewed and minor amendments made by Farrer's (School's solicitors)
1.0	26/06/2023	Version 1 baseline agreed by DPO. Agreed no DPSC approval required.
1.1		(Minor amendments)
2.0		(Significant update that warrants an uplifted Major version)

### Referenced Documents

Document	Version
London Business School's Research Lab Privacy Notice	

# General Privacy Notice for Research Participants

This privacy notice tells you what to expect us to do with your personal information when you participate in LBS research. This privacy notice applies to research participants that participate in research conducted by Faculty, Researchers or PhD students of LBS.

## 1. Introduction

At **London Business School**, we are committed to safeguarding your personal information during your participation in our research. We strive to uphold the highest standards of research integrity, guided by policies and procedures that ensure compliance with the UK General Data Protection Regulation (**UK GDPR**), the Data Protection Act 2018 (**DPA 2018**) and any other relevant data protection legislation.

This Privacy Notice is designed to inform you about our practices in handling your personal data. In line with the transparency principle of the UK GDPR, this privacy notice explains how we process (for example, “**collect**”, “**use**”, “**share**”, “**transfer**”, “**disclose**”, “**dispose of**” and “**safeguard**”) personal information that you provide to us in the following scenarios:

- The handling of personal data of participants involved in LBS-conducted research, excluding those participating in research and/or studies conducted by LBS Research Lab which you have provided to the School.
- Instances where personal data may be processed indirectly as part of LBS-conducted research i.e. personal data received from third parties.

If you are a participant in research conducted by the LBS Research Lab, please note that this privacy policy does not apply. Instead, you should refer to the 'London Business School's Research Lab Privacy Notice' instead, available [here](#).

We encourage you to read this notice carefully to understand our data processing practices. Additional information about the use of your personal data may be provided to you when you agree to participate in a specific research project.

We periodically update this privacy notice. The privacy notice was last updated on 5<sup>th</sup> June 2024.

## 2. Who are London Business School and what are our Data Protection Obligations?

### Who we are

London Business School is an exempt charitable and graduate business school established in the UK by Royal Charter (RC 000721). Founded in 1964, we are a member institution of the University of London. In this document, when saying “**we**”, “**our**”, “**us**”, “**the School**” or “**LBS**”, we are referring to London Business School.

### Our Obligations

We are registered as a Data Controller with the Information Commissioner's Office (**ICO**), the UK's independent authority that ensures compliance with data protection laws. Our registration number in the Data Protection Register is: Z8182937.

In most cases, we will be the data controller when processing your personal data as part of any LBS research activity, which means we will decide how your personal information is processed. We will do so in line with the objectives of the research activity, ensure that we collect only what is appropriate and necessary, and inform you of what we are collecting and how it will be used.

For research conducted by London Business School through the Research and Faculty Office, the Data Controller is usually London Business School for the purposes of UK data protection law. This means that when we design and run our research projects, we will determine how your personal data will be processed. We will make sure to only collect the personal data that is appropriate and necessary for the research, such as demographic information or responses to survey questions, and will always inform you about what data we are collecting.

For some research projects, the organisation(s) funding the research might also make decisions regarding your data. If this happens, we will clearly state it in the information sheet provided to you when you agree to participate in the research.

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## 3. Why Do We Process Your Personal Data?

Research is a fundamental aspect of our academic progress at LBS, contributing to innovative insights to our collective knowledge as a society, helping to solve tomorrow's biggest challenges and creating positive social change through business.

At LBS, we collect and process personal data to facilitate our research endeavours. As part of the research, we may use personal data in the following ways:

1. **Participant Evaluation:** We may use personal data to assess your potential participation in our research studies.
2. **Research Design:** We may use demographic information to help us design effective studies in order to ensure that our sample represents the population under study.
3. **Data Analysis:** Where appropriate, we may use personal data to analyse research results and to allow us to control for variables such as age or gender.
4. **Participant Tracking:** In longitudinal studies, personal data helps maintain accurate participant records over time.
5. **Improving Relevance:** Gathering personal data ensures that our research aligns with the needs of specific individuals. For instance, a study about a specific community requires data from individuals from within that community..
6. **Insight Generation:** We use personal data to carry out research projects, identify new insights, and fulfil any additional purposes outlined in the participant information sheet.

Our Faculty, Researchers and PhD students conduct research that is intended to make unique contributions to their respective fields of study. We adhere to ethical guidelines in the collection and use of personal data. Once personal data is anonymised, the School's research is published to share these new insights with the public. Some of our research projects may involve collaborations with commercial organisations and funders. For more detailed information, please visit our Faculty and Research pages, [here](#).

## 4. What is Personal Data?

The UK GDPR defines “**personal data or personal information**” as any information relating to an identified or identifiable natural person (a “**data subject**”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. This includes information which may not explicitly identify you (e.g. where your name has been removed) but which does make it possible to identify you if that information is combined with other information that is readily available. For example, this might be because the information available contains a postcode, your gender and date of birth; in these circumstances it might be possible to identify you by using this in conjunction with other information available elsewhere.

## 5. What personal data do we collect about you?

Research project requirements and objectives may vary considerably, therefore, the type and category of personal information collected and used will depend on the particular research objectives of the project you are participating in. However, please be assured that the personal data we collect will always be proportionate to achieving those objectives.

We may collect or use the following types of information as part of our **research activities**. Please be aware that the categories listed below are intended to illustrate the breadth of the research data we may collect. However, not all categories are likely to be applicable to every research study in which you participate:

- Name(s)
- User ID
- email address(es)
- home address(es)
- telephone number(s)
- date of birth or birth year
- age

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- nationality
- educational background
- employment history
- location data
- your image and likeness, including as captured in photos or video recordings for studies where this is explicitly stated
- call recordings
- IP addresses
- website and app user journey information
- records of consent, and
- any other personal data used for research administration or quality management, as well as personal data which is relevant to your research participation or provision of LBS Faculty & Research services, proposed research or archiving activities.

Whilst we do not routinely collect special category data as a matter of course, it is possible that we may also collect or use the following special category and sensitive data as part of our **research activities**:

- race or ethnic origin
- political opinions and beliefs
- religious or philosophical beliefs
- trade union membership
- genetic information
- biometric information (where used to identify someone)
- details about your health, e.g. physiological data, disabilities, dietary requirements etc
- sexual orientation information, including biological sex, gender and/or gender identity, specifically whether your gender identity is the same as the gender originally assigned to you at birth
- sex life information, and
- criminal convictions and offences.

Please note that access to, and the sharing of sensitive personal data is controlled very carefully by LBS, and you will be specifically informed about this in research consent forms, where applicable.

All personal information is kept strictly in line with our policies or any regulatory requirements. Our researchers are asked to anonymise and remove personal identifiers (such as your name) and replace this with a unique code or key (pseudonym), or to delete personal information collected as part of their research at the earliest possible opportunity.

## 6. What is the legal basis for processing personal data under data protection law?

At London Business School, our commitment to the community extends beyond education. As part of our mission, we conduct research that drives societal progress, knowledge and innovation.

Under UK GDPR, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally rely on the following principal lawful bases to process your information:

- **Public tasks that are in the public interest.** Research is often undertaken under this legal basis. It covers processing that is necessary in the public interest for archiving purposes, scientific or historical research purposes or statistical purposes. Where such processing includes the processing of special category data, that processing shall be subject to appropriate safeguards, in accordance with UK data protection law.
- **Consent.** You have given us your specific consent to process certain personal data in accordance with UK data protection law. If you have given your consent and you wish to withdraw it, please contact us using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to participate in the research activity.
- **Legitimate Interests.** We also process personal data because it is necessary for our or a third party's legitimate interests. Our legitimate interests include conducting the research or related activity in accordance with charitable objectives, conducting research in an efficient, effective and high-quality manner, and reviewing and improving our research activities.

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- **Legal obligations.** We process your personal data for our compliance with our legal obligations including for tax and reporting requirements, charity regulations, to report crimes and serious incidents. In this respect and if required, we will share your data with competent authorities and regulators such as the Charity Commission.

If we require your consent for any additional uses of your personal information, including your image and more sensitive personal information, we will collect it before you participate in the study concerned. You can withdraw your consent up until the point data is analysed (please see below for further information about your rights). For **research projects involving** children, young people and other vulnerable groups, the **LBS** research ethics committee will agree an appropriate consent procedure to ensure participant rights are protected. Full details will be given to you in an information sheet.

## 7. How we collect information about you?

There are many ways in which we may gather your personal data for research purposes. That being said, most of the personal data we process is provided to us directly by you. This will be collected through your participation in any research activity and through correspondence with us by post, telephone, email or otherwise. However, in some other cases, personal data may be collected indirectly (for example, from third-parties or from publicly available sources).

Participant recruitment at LBS is always conducted in a manner that respects the individual's autonomy. Participation is entirely voluntary, free from any form of coercion, whether overt (explicit) or covert (implicit).

### How are you identified to take part in a research project?

Participants are recruited through various means, including (but not limited to) emails, social media, internal lists, posters and leaflets or in collaboration with other universities, organisations and other professionals or researchers.

## 8. Who has access to your personal data? / Who do we share your personal data with?

Initially, your data may be shared within the research team conducting the project you are participating in. This may include where a PhD student undertaking the research shares your personal data with their supervisor (if applicable). This sharing may allow you to be identified as a participant to achieve the research outcomes. However, most personal information used in research will be anonymised before it is shared more broadly or published.

LBS is responsible for safeguarding your personal data. Only the research team involved in the study will access this data, except in cases where we may need to share it with the following entities:

- our professional and legal advisers when their advice or assistance is required
- our Senior Leadership Team/Ethics Committee, who may use it to check our ethical and legal compliance
- law enforcement agencies and other government authorities if we are legally obligated to disclose the data, and
- other individuals engaged in research activities or research data collaboration, such as third parties processing data on our behalf.

You will be informed through an information sheet if there are collaborators not employed by the School who will also have access to your information

## 9. How do we safeguard your personal data pre, during and post research activities?

In order to protect your rights and privacy in the personal data we collect for our research and archiving activities and to comply with UK data protection (and other applicable laws) for processing special category and criminal data, we have implemented safeguards to ensure the safe and ethical use of your information. This includes:

1. **Policies and Training:** We have policies and procedures in place that guide our Faculty, staff and PhD students on how to safely collect and use your information. We also provide training to ensure they understand the importance of data protection.

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2. **Security Measures:** We employ security standards and technical measures to ensure your information is stored safely and securely, such as access controls, data encryption, data minimisation, anonymisation and pseudonymisation, secure data storage, regular backups and audits.
3. **Ethical Approval:** All our research projects involving human participants are scrutinised and approved by a research ethics committee.
4. **Third-Party Contracts:** Our contracts with third parties include clauses that outline each party's responsibilities for protecting your personal information.
5. **Data Protection Impact Assessments:** We conduct these assessments on high-risk projects to ensure your privacy, rights, and freedoms are not affected.
6. **International Collaborations:** If we collaborate with entities outside of Europe, we ensure that any transfers of personal information comply with UK data protection law.

## 10. What are your rights in relation to your data?

Under UK data protection law, you have the following rights:

<b>Right of access</b>	You have the right to ask us for copies of your personal data.
<b>Right to rectification</b>	You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
<b>Right to erasure</b>	You have the right to ask us to erase your personal data in certain circumstances. This is also known as the " <b>right to be forgotten</b> ".
<b>Right to restriction of processing</b>	You have the right to ask us to restrict the processing of your personal data in certain circumstances.
<b>Right to object to processing</b>	You have the right to object to the processing of your personal data in certain circumstances, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.
<b>Right to data portability</b>	You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
<b>Right to withdraw consent</b>	When we use consent as our lawful basis you have the right to withdraw your consent.

Please note that the above rights are not absolute, and we may be entitled (or required) to refuse requests where exceptions apply. If you wish to exercise any of your rights under data protection law, please contact our Senior Data Privacy Manager using the contact details in section 13 of this privacy notice.

### How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at section 13 of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO (although the ICO recommends that you first contact us). The ICO can be contacted as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
Website: <https://www.ico.org.uk/make-a-complaint>

## 12. How long will your information be kept for?

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We will retain your personal data for as long as is necessary to conduct a particular research project and/or if we think it will be useful for further research and/or funding stipulations or as necessary to comply with any applicable legal obligations.

Once your data is anonymised, the research data may be deposited in a data archive at LBS or with a third party e.g. the UK Data Archive or Open Science framework will be de-identified (anonymised) before deposit. Any keys to research participants, that is, a list of the research participants and a unique identifier used to de-identify individuals within a research data set will be kept separately from that research dataset while the research is ongoing and destroyed prior to deposit.

## 13. Who to contact if you have queries about this Privacy Notice for Research Participants

There are two ways to contact us:

<p><b>You should contact our Senior Data Privacy Manager at <a href="mailto:dpo@london.edu">dpo@london.edu</a> if:</b></p> <ul style="list-style-type: none"> <li>• you have a query about how we process your data;</li> <li>• you would like to report a data breach (e.g. if you think your personal data has been lost or disclosed inappropriately);</li> <li>• you would like to complain about how we have used your personal data; or</li> <li>• you would like to exercise one of your data rights</li> </ul>	<p><b>You should contact the Assistant Director, Research Support at <a href="mailto:researchsupport@london.edu">researchsupport@london.edu</a> if:</b></p> <ul style="list-style-type: none"> <li>• you have concerns with how the research was undertaken or how you were treated; and</li> <li>• you have not been able to resolve your concerns with the principal researcher</li> </ul>
<p><b>Our postal address is:</b> London Business School, Sussex Place, Regent's Park, London NW1 4SA, UK  <b>Our telephone number is:</b> 020 7000 7000 (switchboard)</p>	

## 14. Further information and support

For further information about how we process personal data or general data privacy support, please visit:

### 1. Our LBS website:

We encourage you to visit our 'data protection and information security' pages in the 'policies and legislation' section of our website for more information about our personal data processing practices. Our website can be accessed at: <https://www.london.edu/about/london-business-school/policies-and-legislation>

### 2. The Information Commissioner's Office (ICO) website:

- As the UK's regulatory authority for data protection, the ICO provides valuable information and guidance for the public, available here: <https://ico.org.uk/for-the-public/>
- **ICO Contact Services:** The ICO extends its support through a telephone helpline, live chat facility, and email enquiry service. For more information about these services, please visit the ICO's Contact Us page at: <https://ico.org.uk/global/contact-us/>