INTERNAL AU STAFF PROCEDURES FOR
REGISTRATION OF RESEARCH-RELATED DATA

Are you processing or do you want to process personal data?

NO

You do not need to take further action. However:
• Be aware that all original data must be stored for at least 5 years after the latest publication.
• Consider if there is a need for cooperation agreements. NB: Must be sent to TTO prior to signature, tto@au.dk.

DATA PROCESSOR

YES

NOT SURE

Determine your function in relation to data with your collaborators. Are you a:
1. Data processor
2. Data controller?

DATA CONTROLLER

• If you are the data processor for an internal project, you DO NOT need to enter into a data processing agreement, but data can only be processed in relation to the purpose.
• If you are the data processor for an external project, you MUST enter into a data processing agreement, which the external data controller must provide you with. Contact TTO, if this proves problematic, tto@au.dk. In addition, the project must be registered here: medarbejdere.au.dk/en/informationsecurity/data-protection/in-particular-concerning-research/notification-form-data-processor/
• Consider if there is a need for cooperation agreements. NB: Must be sent to TTO prior to signature, tto@au.dk.
• Data must be deleted when it has served its purpose or the permission expires. Enter into a new or extend the existing data processing agreement. Alternatively, a transfer agreement can be made, by which you become the new data controller.

• Can (and should?) existing data be deleted or irrevocably anonymised in ALL versions (including data kept by your data processors, if any)? (NB: Pursuant to AU policy, all original data must be stored for at least 5 years after the latest publication).

If no, and in the case of new projects:
• Register the project at AU: medarbejdere.au.dk/en/informationsecurity/data-protection/in-particular-concerning-research/notification-form-data-controller/
• Disclosure:
  • If you want to have data disclosed for your project, TTO can assist with the process, tto@au.dk.
  • If you want to disclose data to an external data controller, you must complete and submit this form: medarbejdere.au.dk/en/informationsecurity/data-protection/in-particular-concerning-research/disclosure-of-personal-data/. The recipient of data must complete this form: medarbejdere.au.dk/fileadmin/user_upload/GDPR/Transfer_of_personal_data_from_Aarhus_University_to_receiver_Jan19.docx
• Data processing agreements:
  • Contact TTO, tto@au.dk. Enclose a copy of your AU registration of the project. TTO will send you a draft.
  • AU staff are only required to enter into data processing agreements with external collaborators (salaried assistants are regarded as internal).
  • NB: Agreements must generally also be made if data is stored on and/or collected from other servers than AU’s. This also goes for online data collection where you must register the provider as a data processor.
• Declarations of consent and participant information:
  • They must be sent to TTO who will assess if the GDPR requirements are met, tto@au.dk. TTO has prepared a guide: medarbejdere.au.dk/en/informationsecurity/data-protection/general-information/declaration-of-consent/
  • In the declaration of consent, you must state if you want to disclose data in the future. Define the purpose as broadly as possible, allowing you to use the data for related purposes later.
• Consider if there is a need for cooperation agreements. NB: Must be sent to TTO prior to signature.

IN GENERAL
• Data must be processed pursuant to AU’s information security policy: informationsecurity.au.dk.
• Security breaches must be reported as soon as possible: medarbejdere.au.dk/en/informationsecurity/data-protection/security-breach-at-au/.
• Important: Be quick off the mark in order to avoid project delays.