

## **Privacy Notice for Special Categories of Personal Data Collected for Human Subjects Research**

### **Summary**

Pursuant to EU and UK data protection laws, the Georgia Institute of Technology (“**Georgia Tech**”) must provide you with information relating to how it will process your personal data as a participant in the research project administered by the Ivan Allen College of Liberal Arts, Principal Investigator Professor Richmond Wong (the “**PI**”), Research Title “Storytelling with Technology Professionals” Research Protocol No. H23259 (collectively, the “**Research Project**”).

The purpose of the Research Project is to better understand the social aspects of technology professionals’ work practices. If you participate in the study you will be asked to create a set of fictional stories describing how fictional characters at a technology company respond to different issues that arise in their work. We will then ask you questions about the stories you created. The story creation session and interview will take approximately 60-90 minutes to complete.

### **Data Controller**

Personal data is any information that identifies you directly or indirectly, such as your name, email address and phone number and your Research Project participant number. Georgia Tech will be the controller of your personal data. This means that Georgia Tech will be responsible for decisions taken regarding how and why your personal data is processed.

Georgia Tech is an institution of higher education involved in education, research, and community development. In order for Georgia Tech to conduct human subjects research, it must collect, use and process personal data related to the participants in the Research Project.

### **Types of Personal Data Collected**

In order for Georgia Tech and the PI to conduct the Research Project, the following categories of personal data may be collected:

- Image
- Name
- Contact information including, without limitation, email address and other location data
- Information you might provide as part of an interview, including for example, information on your prior experiences, opinions, preferences, likes and dislikes
- Biographical information (e.g. job title)
- Photographs, video, and audio of you and your likeness as it appears in such photographs, video, or audio recordings
- Your reactions as they might be captured in photographs, videos, or audio recordings and emotions as they might be deduced from photographs, videos, or audio recordings.

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Some of the data we might process about you is considered ‘special category data’. Special category data includes biometric data and any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs and trade union membership information.

For example, we might process special category data about you if you complete a form, email us or otherwise share with us any information concerning your religious or political beliefs or information relating to your ethnicity. We might process biometric data about you as part of processing photographs of you taken during the course of the Research Project (but only if we apply specific technical processing to the photographs of you such as to create an individual digital profile of you that we use for automated image matching).

### **Purposes and Lawful Bases for Collecting and Processing of Personal Data**

**Facilitating the Research Project:** Georgia Tech will mainly use your information to facilitate the running of the Research Project and your participation in the Research Project.

As part of the Research Project, Georgia Tech might review and analyze your personal data and create profiles about you and other Research Project participants. The information you provide during the Research Project, or any profiles created about you might be compared to information provided by and profiles created about other participants. We might make observations and deduce information from the personal data you provide to us.

Our lawful basis for collecting and otherwise processing your personal data for you to enroll and take part in the Research Project would be the performance of steps prior to entering into a contract with you and for the purposes of administering the contract we have with you, namely, the Research Project participation terms you sign up to.

We might also process your personal data as part of running the Research Project for our legitimate interests, such as brand recognition, including the reputational benefits of publishing the results of the Research Project.

Our lawful bases for the processing of your special category data in the course of running the Research project will be your consent and explicit consent.

**You can withdraw your consent at any time. Please note that the withdrawal of your consent will not, however, affect, the lawfulness of the processing of your data carried out up until the withdrawal of your consent.**

**Safety Reporting and Inspection Compliance:** In addition, we may process your personal data to comply with our legal obligations related to safety reporting or an inspection by a competent authority, including such authorities listed in the table under the section entitled **Sources of Data and Data Transfers to Third Parties**.

### **Other purposes:**

We might process your personal data in accordance with our legitimate interests in bringing and defending ourselves against legal claims. If your special category data is processed as part of

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establishing, exercising or defending legal claims, such establishment, exercise or defense of legal claims will also be the lawful basis for the processing.

### **Refusal to Provide Personal Data**

If you refuse to provide personal data that is required by Georgia Tech in connection with one of Georgia Tech's lawful bases to collect such personal data, such refusal might not allow you to take part or continued taking part in the Research Project.

### **Sources of Data and Data Transfers to Third Parties**

We will primarily receive personal data about you directly from you. For example, when you complete a form in which you provide details about you and as part of you taking part in the Research Project.

We may also collect and share personal data with service providers who help us recruit participants and facilitate the Research Project such as Prolifics and Amazon and operating applications which help us run the Research Project such as Zoom, Microsoft (Microsoft Teams), Meta (WhatsApp), Miro, Figma, and Box.

Additionally, the personal data collected for the Research Project might be shared with the (a) U.S. Federal Food and Drug Administration; (b) U.S. Office of Human Research Protection and (c) Board of Regents of the University System of Georgia (the "BOR") so they may exercise governance and oversight over Georgia Tech's activities in compliance with U.S. federal and state law.

### **International Transfers of Personal Data**

Some of the above service providers and institutions may be located in countries, such as the United States, that do not recognize a level of privacy protection equivalent to that in the EEA. Please do not take part in the Research Project if this is unacceptable to you.

### **Individual Data Subject Rights**

You have the following rights with respect to your personal data, which apply differently in different circumstances: right of access, right to rectification, right to erasure, right to restriction of processing, right to data portability, and you also have the right to object to processing and to be informed. Please see below for a brief description of each of these rights.

Access: Upon request, you are entitled to confirmation that we process your personal data and to receive a copy of your personal data.

Rectification: If the personal data we hold about you is incorrect, you have the right for it to be rectified.

Erase: You can request us to erase your personal data including when there is no compelling reason for us to continue processing it, if (a) we rely on your consent for the processing of your personal data and you withdraw your consent; (b) we rely on legitimate interests for the processing and there are no overriding legitimate interests to continue the processing; (c) we have to erase the information to comply with a legal obligation; or (d) we have processed the information unlawfully.

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Restriction: You may request a restriction on the processing we undertake on your personal data. This right will only apply if (a) you contest the accuracy of your personal data; (b) the data has been unlawfully processed and you oppose erasure and request restriction instead; or (c) we no longer need the personal data, but you need us to keep it in order to establish, exercise or defend a legal claim.

Objection: You may object to our processing of your personal data if our processing is carried out on the basis of our legitimate interests. Please note, however, that should we determine that our interests are so compelling as to override your objection we may continue to process your personal data.

Portability: You may have the right to receive some of your personal data in machine readable format. This right allows you to request that such data be sent to a third-party controller.

Withdrawing consent: If the lawful basis we rely on to process your personal data is consent, you have the right to withdraw this consent. Please email the PI, Professor Richmond Wong, at [rwong34@gatech.edu](mailto:rwong34@gatech.edu) to withdraw consent for the processing of your personal data.

To withdraw your consent for the processing of your personal data by a third party, please contact the relevant organization.

Your right to be informed: You can contact us to find out more or to ask any questions you may have about our use of your personal data.

**Note: Exercising of these rights is a guarantee to be afforded a process and not the guarantee of an outcome.**

Any data subject who wishes to exercise any of the above-mentioned rights may do so by filing such request with the PI Professor Richmond Wong at [rwong34@gatech.edu](mailto:rwong34@gatech.edu).

You also have the right to lodge a complaint with the competent local Data Protection Supervisory Authority. In the UK, this is the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>).

## **Cookies**

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication. For information related to how Georgia Tech uses cookies, refer to Georgia Tech's [Privacy and Legal Notice](#).

## **Security of Personal Data Subject to the GDPR**

All personal data and special categories of personal data collected or processed by Georgia Tech must comply with the security controls and systems and process requirements and standards of NIST Special Publication 800-171 as set forth in the [Georgia Tech Controlled Unclassified Information Policy](#).

## **Georgia Open Records Act**

As a state university, Georgia Tech is subject to the provisions of the [Georgia Open Records Act](#) (ORA). Except for those records that are exempt from disclosure under the ORA, the ORA provides that all citizens are entitled to view the records of state agencies on request and to make copies for a fee. **The ORA requires that Georgia Tech produce public documents within three**

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business days. For more information on Georgia Tech's ORA compliance, please visit the [Open Records Act page on the Legal Affairs website](#).

### **Data Retention**

Georgia Tech follows the data retention guidelines referenced in the [University System of Georgia Records Retention Schedules](#).

Personal data collected in this study will be held for 5 years.

If you have specific questions regarding the collection and use of your personal data, please contact the Principal Investigator at Professor Richmond Wong, [rwong34@gatech.edu](mailto:rwong34@gatech.edu).

For more information regarding these EU and UK data protection regulations, please review Georgia Tech's [EU General Data Protection Regulation Compliance Policy and/or the ICO Guide to Data Protection Principles](#).

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