General Data Protection Regulation (GDPR) Supplemental Guidance for Researchers

**Purpose:** The purpose of this Guidance is to ensure reviewing offices have consistent information to evaluate the context surrounding the transfer of Personal Data (including Pseudonymized Data) associated with your DUA.

**Instructions:** You, as the Researcher managing this DUA (or your appointee), must read this Guidance and ensure the required information is accurately reflected in the SmartForm as specified below. The DUA will not be approved until this information has been provided.

PLEASE NOTE that Personal Data received under this DUA:
➔ May only be shared with Research Team members included in the corresponding Data Safety record
➔ Must be fully Anonymized or destroyed at the end of the Period of Performance

1. **Will the Personal Data solely be used for research purposes (classroom, scientific, historical, etc.)?**
   
   In the SmartForm: Please provide your response, including a description of any intended uses, on Page 1, Agreement Upload, Question 7

2. **What is the scale and regularity of the Personal Data transfer? For example, will there be more than one transfer, or is it a one-time event? How many datasets will be transferred?**
   
   In the SmartForm: Please provide your response on Page 3, DSP Agreement Information, Question 1

3. **Will any Special Categories of Personal Data be exchanged?**
   
   Special Categories of Personal Data: Health (mental or physical), sex life or sexual orientation, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric, or *criminal activities (*treated similar to Special Categories)

   In the SmartForm: Please provide your response, including a description of datapoints on Page 3, DSP Agreement Information, Question 1

4. **Will any parties other than the Provider and Harvard have access to the Personal Data exchanged under this DUA (either before Harvard receives the data, or afterwards – includes collaborators, vendors, subrecipients, etc.)?**
   
   In the SmartForm: Please provide your response, including a comprehensive description of any third parties, on Page 4, DSP Additional Information, Question 2

5. **What is your anticipated Period of Performance? Please provide a month and year for either full Anonymization of the Personal Data (destroying all identifiers and links to any individuals), or complete destruction of the Personal Data.**
   
   In the SmartForm: Please provide your response on Page 4, DSP Additional Information, Question 3

   *Note: Once the Personal Data has been destroyed or Anonymized, you will need to reflect this change in the corresponding Data Safety record