**7.4 Plan for data processing (sample)**

**Plan for data processing**

***For the research entitled***

***[title of research]***

***[registration number of research]***

1. *Protection of personal data*

**Relevant acts of law, documents and definitions**

* REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
* Act CXIX of 1995 on the use of name and address information serving the purposes of research and direct marketing
* Act V of 2013 on the Civil Code
* Act LXXVI of 2014 on scientific research, development and innovation
* Act CCIV of 2011 on National Higher Education
* Act C of 2012 on the Criminal Code

***[the validity of the referred acts of law needs reviewing]***

*Personal data:* any information relating to an identified or identifiable natural person (‘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. (Art. 4 GDPR)

*Special data*: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation. (Art. 9 GDPR)

*Consent:* any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her (11, Art. 4 GDPR)

*Research participant*: a person directly affected by the research, whose observation or the collection of whose data occurs in connection with the research.

*Head of research:* a person whose position is defined on the basis of a documented research project with a leading role in and responsibility for that project. A head of research can only be a qualified (PhD) researcher. The head of research is also, in most cases, given this role by a support grant, but research activities can also be carried out without a grant. In exceptional cases, an unqualified researcher may also conduct individual research, but in this case the head of the department appoints a qualified (PhD) supervisor to monitor the research.

*Contributor to the research:* the natural person who participates in the realisation of the research under the direction of the head of research.

*Lead researcher:* a researcher with a PhD degree who is qualified to conduct independent research and to supervise the work of other unqualified, subordinate researchers.

The above plan for data processing was created on *[date of document]* based on and in accordance with the valid contents of the referred documents.

**2. Authorisation of research**

Eötvös Loránd University (henceforth: ELTE) as an institution of higher education is, based on Paragraph 1, Section 2 of the National Act on Higher Education (NFTV), an organisation established for the performance of educational, academic research, which shall constitute its core activities, which the founding charter of ELTE records, in accordance with NFTV. The personal responsibility for the research is taken by the head of **[research */ research group*]**.

**3. Purpose of research**

*[brief, simple description of the research]*

**4. Scope and source of personal data to be processed**

*[the accurate, brief description of the personal data to be processed including their sources]*

**5. Responsibility for data processing**

*[Please indicate who is responsible for the processing of data throughout the entire data cycle. Please also include the responsible person’s contact details.]*

**6. Steps of the research and the procedure of processing personal data**

*[Detailed description of the steps of realisation of the research and the processing of personal data from the collection of the personal data to their storing; it is necessary in every case to also record the time of destruction of the personal data; it is necessary to include information about the processing of the personal data of all involved (participants and contributors) and also who collect the personal data, if and how they handle them while processing them, and at which point of the research these data are handed over to the head of research (anonymized research data are not necessary to include here).]*

**7. Securities of the enforceability of the rights of the affected**

*[Detailed description of the measures ensuring the enforcement of the rights of the affected, whose personal data are processed, especially but not exclusively the measures taken towards the exercising of their rights to withdraw their previously given consent, the correction of data, their access to knowing the stored data and their being informed in connection with any data processing incidents. E.g., means of giving information, channels of communication, responsible persons, proceedings]*

**8. Technical and administrative measures to ensure data protection**

*[Detailed description of how the protection of personal data is ensured during the research, such as but not exclusively who may access the personal data, how they document the access, what kind of statements these persons make, what protective measures (information technology or other) are taken to prevent personal data to be accessed by unauthorized people and what procedures of anonymization (or pseudonymization) are employed etc.]*

1. *Publicity of the research data*

**9. Description of the research data**

*[Please describe what kind of data of scientific value are collected or recorded; please understand the concept of data in the broader sense, extending it, besides quantitative data, to data of qualitative research, photographs, films and data collected from the internet.]*

**10. Presentation of the available data**

*[Please write a review on the data available in the research topic and on why they are not appropriate for answering the research question. This will make the value of the proposed research and the necessity for data collecting clear.]*

**11. Format of the data**

*[Please describe here, in what format the data are submitted, disseminated and archived.]*

**12. Metadata**

*[Please summarise here, what kind of metadata you add to the created data to assist the clear understanding of those wo access them.]*

**13. Storing and safety copies**

*[Please describe here, where and in what form the collected data will be stored. The best practice is the storing of (anonymized) data at several different places.]*

**14. Intellectual property and data property**

*[Please indicate who possesses ownership of the data and other intellectual properties, such as developed scales.]*

**15. Accessibility and sharing**

*[Please describe in what form, scope and where you are going to make the research data available.]*

**16. Costs of data processing**

*[Please summarize briefly, from what sources you are going to cover the expenses of the publication and archiving of the anonymized data.]*