

Checklist for the content of the information to be provided according to the GDPR when collecting personal data

Mälardalen University is responsible for the personal data processing that our students conduct within the framework of their studies. This means that as a student you have an obligation to inform people about personal data processing, if you intend to conduct it, within the framework of your studies such as when doing your degree project.

For whom

This checklist is designed for you as a student at Mälardalen University and if you will handle personal data in your work or project. The checklist is intended to help you when compiling the information that you are required to provide to the person whose personal data you will be processing according to the GDPR. This person is referred to as "the data subject" in the text and in the checklist.

It is never sufficient to simply refer to "I comply with the applicable legislation regarding personal data" or similar, instead the complete information must be provided at the time of collection. Keep in mind that you must write concisely, clearly and transparently and that the information should be adapted to the data subject. There is also a right to receive the information orally if the data subject prefers this.

Limitations

As a student, you must primarily use the legal basis consent if you process personal data within the framework of your studies at MDU. This checklist is therefore limited to informing people about the requirements that are valid regarding the information to the data subject when using the legal basis consent. If you use a different legal basis to support personal data processing, there may be additional information requirements that you must furnish the data subject with.

If you have any questions or concerns regarding this or other questions regarding the checklist, please contact your supervisor, course coordinator or similar in the first instance who can contact the University's Data Protection Officer if necessary for further advice.

Reading instruction

The texts in italics are explanations of the current point and are an example of how you can design the information. Please note that these are only examples and that you are free to formulate the information in the way you think is appropriate based on the checklist's requirements. If you use the proposed formulations, you must ensure that the formulations suit your study project and the type of processing of personal data you will conduct. If you want to change the order of how you convey the information, how to write it, etc. it is of course okay but make sure not to forget any point if it is to be included. Also important is that you use correct language and that it is easy to read.

When information shall be provided

Please note that information should be provided to the data subject when the personal data is collected and before the processing of the data begins. It is therefore not allowed to first collect the information and then inform the person, the information must have already been given before a photo shoot, filming, test session or interview begins, for instance.

Checklist

Inform people about:

1. Who is the data controller and provide contact information to that person and the natural person who is representing the data controller.

Mälardalen University is usually the data controller. However, in the case of cooperation, several people may be data controllers. Sometimes it can be someone else who is responsible and you as a student do the collection as part of an assignment.

A natural person should be the person responsible for, for example, the course on which the student project takes place.

Examples of information: "The data controller is Mälardalen University, contact person Name Family name, course coordinator for the course ABC123."

2. Name and contact details of the Data Protection Officer, email and telephone number.

Information about the Data Protection Officer at Mälardalen University can be found [here](#).

3. The reason why the personal data will be processed as well as the legal basis for the processing.

In the case of student projects, it is in principle only consent that can be relevant as the basis for the processing. Briefly describe the use so that the data subject can understand how their information will be handled. For a consent to be

considered voluntary, the data subject must understand the purpose of the processing, i.e., what the person agrees to. More information about consent can be found on The Swedish Authority for Privacy Protection's (Integritetskyddsmyndighetens) website: [Consent as legal basis | IMY](#)

Examples of information: "Your personal data will be processed in our study project regarding /name of the study/ within the framework of our degree project at Mälardalen University. We need your data to be able to carry out the study project and present a result in our degree project."

4. Who will be able to access the personal data or which functions that will use it.

For example, just you as a student or if you are several students, possibly an examiner for the verification of results, etc.

5. Check that the data will not be transferred to a third country (a country outside the EU/EEA or to an international organisation) and inform the person about it.

According to the GDPR, the transfer of personal data to a third country is not allowed as a general rule. Specific rules regarding when a third country transfer is allowed can be found in the GDPR. It is a complex area and as a student you should ensure that the personal data you process will not be handled outside the EU, for example by storing it in databases outside the EU. This may be the case, for example, if you use a cloud service solution to store the data during your work. Therefore, you should not store the data in such solutions unless it is fully ensured that the data is not at risk of being handled outside the EU. Please note: Posting something on the internet does not automatically mean that it is transferred to a third country. However, if it is posted on social media, it can be an issue of such a transfer. Due to the complexity of the subject, it is recommended that you ensure that the data you process is not transferred to a third country.

Examples of information: "Your data is stored / (for example on a local folder on a computer)/and no transfer of the data takes place outside the EU."

a) Inform people about how long the personal data will be saved, or, if it is not possible to specify, what governs the length of storage.

For instance, the length of the student project, if it is relevant to reuse the material for further thesis/projects, etc.

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b) Inform people if there is a right to access and, where possible, to rectify or delete personal data or to restrict the processing relating to the data subject or to object to the processing. The right to data portability (that the collected information can be easily transferred to another) shall also be disclosed, in the event that it could be relevant.

Data portability may be relevant if, for example, you develop an app to facilitate a service. The right to data portability exists to make it easier for individuals to switch to another bank or insurance company, for example.

Examples of information: "You have the right to access the data we process about you, request rectification or deletion of your personal data or restrict the processing of your personal data. You also have the right to object to the processing and (the right to transfer your personal data to another data controller). To exercise your rights, contact the person acting as data controller for Mälardalen University: Name, Family name, course coordinator for the course ABC123. "

c) Where the use of the personal data is based on consent, you shall inform the data subject that they have the right to withdraw their consent at any time and how this should be done in practical terms. In addition, information shall be provided that a withdrawal of consent does not affect the legality of the use of personal data made before this occurred.

Information that has been collected based on consent prior to a withdrawal may therefore continue to be used. However, new information may not be collected.

Examples of information: "You may withdraw your consent to the processing of your personal data at any time." If you withdraw your consent, new data will not be collected, however, the data you provided before your withdrawal will continue to be processed, which is in accordance with the law. To withdraw your consent, contact the person acting as data controller for Mälardalen University: Name, Family name, course coordinator for the course ABC123. "

d) the individual shall be informed that they have the right to lodge a complaint about the use of their personal data. Either this can be made to the Mälardalen University's Data Protection Officer or directly to The Swedish Authority for Privacy Protection (IMY), which is the supervisory authority. Contact details for the Data Protection Officer can be found [here](#) and contact details for IMY can be found [here](#).