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## Guidelines for students who process personal data at Södertörn University

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## Introduction

If you want to write an essay or project that contains personal data, you must ensure that you comply with the General Data Protection Regulation (GDPR). We have written these guidelines to help you do this.

The general rule is that any personal data you collect may only be used for the purpose for which it was intended. Participants in a study have many rights, including the ability to withdraw their consent and to request correction of their personal data.

There is a short step-by-step guide at the end of this document. This document provides an in-depth explanation of the GDPR.

## Definitions

*Personal data processing* All processing of personal data, e.g. editing, use, etc.

*Data controller* Södertörn University.

*Personal data* Data that can be linked to a specific individual, either directly or indirectly. E.g. name, age, address, email address.

*Sensitive personal data* Data that places higher demands on organisational and technical measures and may only be processed if deemed necessary. E.g. data about ethnic origin, political and/or religious opinions, medical information.

*Privacy-sensitive personal data* Data that is classed as being worthy of extra protection and thus places higher requirements on organisational and technical measures, e.g. personal ID number, a person's living standard, etc.

# 1. Personal data processing under the GDPR

## 1.2 What is personal data?

The first part of these guidelines provides basic information about what personal data is and the legal basis on which students at Södertörn University may process personal data.

Personal data is something that can be indirectly or directly linked to a living natural person. For example, name, address or IP address. All details which, combined or separately, can be traced to one individual, are personal data.<sup>1</sup>

To help you understand what processing personal data means, we have provided a short explanation. All forms of processing that relate to personal data are counted as personal data processing, such as editing, collection, use, etc.<sup>2</sup>

### Example

You want to interview someone who was born on 4 April 2000 and has the postcode 123 45. You write their contact details in a document. There is only one person registered with that postcode and that date of birth. These details (data) can, together or separately, be traced to a living natural person. They therefore constitute personal data.

Tip! Södertörn University provides the Sunet Survey function and Microsoft Forms (via Microsoft 365), which is a digital tool for creating surveys. They allow you to create a survey with a public link that you can share to collect answers. Try to avoid free text answers, so you do not collect more personal data than necessary.

## 1.2. What is sensitive personal data?

As a general rule, according to the GDPR, sensitive personal data may not be processed.<sup>3</sup> There must be an applicable exception if you are to be able to process sensitive personal data. Sensitive personal data includes information about health, political opinions, religious convictions, etc.<sup>4</sup>

In consultation with your supervisor, you must consider which technical and organisational security measures you will need to use. You must do this so that you can protect sensitive personal data in the appropriate manner.

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<sup>1</sup> See Article 4(11) of the GDPR for a full definition.

<sup>2</sup> See Article 4(2) of the GDPR for a full definition.

<sup>3</sup> See Section 1.1 “*What is personal data?*”.

<sup>4</sup> See Article 9(1) of the GDPR for the entire list.

Finally, your supervisor conducts an ethical review of the intended subject of your essay/project. The supervisor then decides whether it is necessary for you to use sensitive personal data to achieve the objective of your essay/project.

Note that personal ID numbers and coordination numbers are not sensitive personal data, although they are personal data that is deemed worthy of extra protection. According to the Swedish Data Protection Authority, personal ID numbers and coordination numbers may only be processed if the person has provided their consent.<sup>5</sup> If there is no consent, personal ID numbers may only be processed if this is in accordance with:

- the purpose of the processing
- the importance of secure identification
- any other significant reason.<sup>6</sup>

### 1.3. What is privacy-sensitive personal data?

An additional category of personal data that requires the appropriate technical and organisational measures is privacy-sensitive personal data. According to the Swedish Data Protection Authority, this is:

- information about wages/salary
- information about legal violations
- evaluative information, e.g. information from staff appraisals, the results of personality tests or from personal profiling
- information relating to someone's private life
- information about living conditions.<sup>7</sup>

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<sup>5</sup> Swedish Data Protection Authority, "*Känsliga personuppgifter*", <https://www.datainspektionen.se/lagar--regler/dataskyddsförordningen/känsliga-personuppgifter/>.

<sup>6</sup> Chapter 3, Section 10, of the Swedish Act containing supplementary provisions to the EU General Data Protection Regulation.

<sup>7</sup> Swedish Data Protection Authority, "*Känsliga personuppgifter*", <https://www.datainspektionen.se/lagar--regler/dataskyddsförordningen/känsliga-personuppgifter/>.

## 1.4 Can an exception for academic purposes apply to my essay/project?

### **Do I need to consider the GDPR when I write my essay/project?**

Yes, you do. Student essays/projects at Södertörn University that process personal data are not covered by an “academic exception”. You must therefore comply with the GDPR.

Students are obliged to follow with the routines and guidelines that have been produced and to conduct their studies in a manner that is compatible with the GDPR. By doing so, you are studying in a manner that is compatible with the GDPR.

For more information about “academic creation”, please see Government Bill 2017/18:105, “Ny dataskyddslag”, p.40ff (in Swedish). The legislators believe that the concept of “academic creation” is integral to the Swedish freedom of the press and freedom of expression.

## 2. What personal data are you processing as part of your project/essay?

### 2.1 What is the difference between non-sensitive personal data and sensitive personal data?

It can sometimes be difficult to know the difference between non-sensitive personal data and sensitive personal data. This difference is important, as it decides which elements of the routine you must use.

If you process personal data in your essay/project, it is important that you know the legal basis for processing the personal data. The general rule is that if you do not have a legal basis for doing so, you may not process personal data.

The following applies to student essays/projects at Bachelor's and Master's levels:

- ✓ That the personal data processing is assessed as necessary for completing a task that is in the public interest<sup>8</sup>, and
- ✓ Consent is collected from each individual participant.<sup>9</sup>

The requirement for necessity must be fulfilled; your supervisor makes that assessment.<sup>10</sup>

Your supervisor must assess whether it is necessary for you to process personal data to fulfil the purpose of your essay/project. Note that you cannot process personal data based solely on consent.<sup>11</sup>

Your supervisor therefore has an important role in evaluating whether it is necessary for you to use personal data in achieving the purpose of your essay/project.

Common categories of **non-sensitive personal data** that you may process are listed below:

- contact details (name, address, telephone number, email address, etc.)
- information for identification (IP address, login, customer number, etc.)
- other details that can, together or separately, identify a living natural person.

Common categories of **sensitive personal data** are listed below:

- ethnicity
- political opinions
- religious or philosophical belief
- union membership
- health status
- information about a natural person's sexual activity or sexual orientation

Remember that the basic principles of the GDPR must always be observed, regardless of the category of data you are processing.

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<sup>8</sup> Article 6(1)(e) of the GDPR and Chapter 1, Section 2, item 1 of the Higher Education Act.

<sup>9</sup> Article 6(1)(e) of the GDPR.

<sup>10</sup> See Bill 2017/18:105, p. 83ff.

<sup>11</sup> See item 33 and item 49 in the introduction to the GDPR and Bill 2017/18:105, p. 56.

## 2.2 What basic principles must I consider?

Every time personal data is processed, the seven basic principles of the GDPR must be fulfilled.

These principles are the core of the GDPR and apply to all personal data processing, so they must be consistently applied when you process personal data. The principles have been integrated into every step of this routine to achieve “inbuilt data protection”.

- Purpose limitation
- Data minimisation
- Accuracy
- Storage minimisation
- Integrity and confidentiality
- Accountability
- Lawfulness, fairness and transparency

[Read more on the website of the Swedish Data Protection Authority.](#)

## 3. Processing non-sensitive personal data in a project/essay

### 3.1 Routine for processing personal data

When you have decided to use personal data in your essay/project, it is important to think carefully about how you will process it. This section applies to non-sensitive personal data. For routines for processing sensitive personal data, see Section 4.1.

#### **Step 1. What is the first thing I have to do?**

You must think about whether processing personal data is necessary to complete your essay/project. If your essay/project will not include personal data, you do not need to follow the routine below. If your essay/project will include personal data, you must follow the routine below. The purpose that you formulate now will be included in the information and consent form you give to people who want to participate in the study.

#### **Example**

For your study, you have decided to interview ten (10) people about their opinions on the local newspaper’s reporting. The categories of personal data for participants will probably be name, email address, and telephone number so you can arrange an interview with each person.

You can formulate your purpose and the purpose of processing the personal data in the following way:

“I need to process the following personal data [state the categories of personal data as above] to organise an interview for my study [describe your work and the purpose of the interview] and to support my conclusions in my essay.”

It is important that you think about and clearly formulate the purpose of the personal data processing.

Common categories of **personal data** that you may process are listed below:

- contact details (name, address, telephone number, email address)
- information for identification (IP address<sup>12</sup>, login, customer number, etc.)

## **Step 2. What does my supervisor need to register?**

Södertörn University has the ultimate responsibility for all personal data processing that occurs within university activities. This also includes the students' examinations and essays/projects.

Your supervisor must therefore keep a register of the personal data processing that occurs as part of examined elements and essays/projects and is responsible for keeping this up to date. The purpose is to create an overview of the personal data processing that takes place at the university and, where necessary, to identify the persons responsible for it.

The register, which must be shown to the Swedish Data Protection Authority if requested, must be up-to-date. For example, your supervisor can keep the completed forms in a folder in their office or have an Excel file where the details are stored digitally. Remember that this information must be kept updated and be erased when the personal data processing is complete.

The register that you must complete and give to your supervisor is appended.

Your supervisor decides how they want to keep their register, either as hard copies or digitally. The most important thing is that all personal data processing at Södertörn University is registered.

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<sup>12</sup> See item 30 of the GDPR, “Natural persons may be associated with online identifiers provided by their devices, applications, tools and protocols, such as internet protocol addresses, cookie identifiers or other identifiers such as radio frequency identification tags. This may leave traces which, in particular when combined with unique identifiers and other information received by the servers, may be used to create profiles of the natural persons and identify them.”

### **Steg 3. What should I think vis-à-vis information security?**

The most fundamental security measure is never to collect more data than necessary. If it is possible to conduct work using entirely anonymous information, this is preferable.

- Ensure that any survey tools fulfil requirements. Sunet Survey and Microsoft Forms (via Microsoft 365) are recommended survey tools.
- Cloud services that are not provided by Södertörn University may not be used when processing personal data. This includes storage services such as Dropbox, Google docs, iCloud, etc.
- Sensitive personal data must never be stored on your personal computer, unencrypted USB stick, telephone or tablet.
- Remember to keep an eye on any print-outs or similar materials.
- Remember to lock or log out of your computer during breaks, etc.
- Recording must be done restrictively, if done at all. Interviews must be done using cloud services that are provided by Södertörn University, e.g. Zoom, Teams, etc.
- Authorisation – the supervisor must determine who is authorised to access the data that has been collected.

### **Steg 4. What do I do with the personal data when my essay/project is finished?**

Once your essay/project has been graded and completed, the personal data must be erased or stored. You need to think about this with your supervisor now, so that you can provide the correct information to your respondents. In this step, you must evaluate what data should be erased or stored, in consultation with your supervisor.

Personal data may not be saved longer than necessary and must be erased when no longer needed. However, there may be situations in which personal data needs to be saved for a certain length of time. For example, the data may be necessary to justify the conclusions in an essay or for future data processing, for example, if the results are to be published in a scholarly article or they are of cultural-historical value.

- **What do I do if the personal data will be erased?**

Once you have erased (deleted/thrown away) personal data and the relevant forms, you must provide an assurance of this to your supervisor using a *record of erasure* (see appendix) that you both sign and append to the essay/project. Your supervisor will submit the graded essay/project and the record of erasure to Södertörn University's archive for further management.

- **What do I do if the personal data is to be stored?**

If your supervisor assesses that the personal data you have collected should be preserved for future generations, for example because it contains information of cultural-historical value, you must submit all the collected material for this personal data (e.g. information and consent forms, sound files, transcriptions, name lists) to your supervisor, who will submit this material and the graded essay/project to Södertörn University's archive for further management.

### **Step 5. How do I collect consent correctly?**

The GDPR requires that anyone who has their personal data processed by the university must have received adequate information, so that they can provide "informed consent". It must be an "unambiguous indication" by the person.<sup>13</sup>

You must inform the person about how their personal data will be collected, processed and later erased or archived. If the person is unable to make an informed choice on participation in the study or is pressured to participate, their consent is invalid.

It is therefore important that your information and consent form contains enough information and accurately describes how you are going to process the personal data.

It must be as easy for a participant in the study to withdraw their consent as it is to provide it. Your contact details must always be included on the information and consent form.

Consent can be provided orally but must be clearly documented. This could be through a recording or a message written in an email from a named email address.

As you – the student – are collecting the personal data, you must prove that there is documented and valid consent. You are responsible for keeping this consent organised during work on the essay/project and preventing non-authorised persons from accessing it.

You supervisor may also choose to store the forms for you, either themselves or at the academic school, depending on what is most suitable considering the topic of your essay/project. Once your essay/project has been graded, the forms must be erased or, in some cases, stored (see step 4).

For respondents to questionnaires, it can be more difficult to get a written consent via the form. You therefore need to have clear information on the first page of the questionnaire, see the “Mall för informationstext” (template for information text).

Consent can be considered as having been given when the respondent actively chooses to participate by answering the questionnaire after reading the information text.

## 4. Processing sensitive personal data in a project/essay

### 4.1 Routine for processing sensitive personal data

The opportunities for processing sensitive personal data that are offered in the GDPR and the Act on the Ethical Review of Research Involving Humans do not apply to education at Bachelor's or Master's levels because this is not considered research.

Government Bill 2007/08:44 (Issues of ethical evaluation etc.) also states that “the Government's opinion is that it is not reasonable to expect that students in first or second cycle education have definitely been able to acquire skills and knowledge to the extent necessary to ensure protection for the people who participate in research. Students should therefore not be given the responsibility entailed in conducting activities in which people participate and where there is a risk of injuring these people physically, mentally or in terms of their integrity”. Supervisors therefore have a great deal of responsibility when guiding and helping you process sensitive personal data in your essay.

A clear purpose and good reasons are necessary if your supervisor is to allow the processing of sensitive personal data. In addition, adequate security measures must be implemented. Your supervisor assesses whether you should use sensitive personal data in your essay/project and, if so, you will work closely with your supervisor.

Your supervisor must instruct you in how to process and manage sensitive personal data and provide advice and guidance while you work on your essay/project.

### **Step 1. Must sensitive personal data be processed to achieve the purpose of your essay/project?**

It is important that you consider and clearly formulate the purpose of the personal data processing in the introductory phase, before you start discussions with your supervisor about processing sensitive personal data in your essay/project. Collecting more personal data than is necessary to fulfil the purpose you have defined is not permitted. Once you have collected the personal data, they may not be used for any other purpose than the one you stated at the time of collection.

#### **Example**

You have decided to interview ten (10) people for your study of public political feeling before an upcoming election. The categories of personal data for the participants will probably be political opinions and contact details, which you use to be able to organise an interview with each person.

For example, you can formulate your purpose and the purpose of processing the personal data in the following manner:

“I need to process the following personal data [state the categories of personal data as above] to organise an interview for my study [describe your work and the purpose of the interview] and to support my conclusions in my essay.”

It is important that you think about and clearly formulate the purpose of the personal data processing.

#### **After this, you must:**

Ask your supervisor to assess the suitability of your intended essay/project.

This assessment is performed in accordance with the Swedish Research Council's principles of good research practice.

If your supervisor's assessment is that your essay/project fulfils the ethical requirements, continue using the routine below. If not, you may not process sensitive personal data.

#### **My supervisor wants to know what a suitability assessment is**

A suitability assessment is the same as an ethical review, which the Ethical Review Agency conducts for research studies. Essays and projects are not covered by the Ethical Review Agency, so the suitability assessment is done by your supervisor.

Your supervisor could conduct a suitability assessment by using the four general requirements for an individual's integrity in research:

1. Consent,
2. Information,
3. Confidentiality and
4. Benefit.

You can write briefly – one or two sentences – about what each requirement entails and how you have taken these into account in your essay/project. Your supervisor should look through this to see whether the requirements are fulfilled, and to assess whether it is necessary for you to process sensitive personal data as part of your essay/project in the appropriate way.

Your supervisor therefore has great responsibility for ensuring that you conduct your studies correctly and with respect for individual integrity.

Your supervisor assesses whether it is appropriate for you to write about a specific topic that deals with sensitive personal data, and what security measures you must implement while writing.

Students may not make their own assessments when it comes to any type of processing of sensitive personal data. Your supervisor must therefore be thorough when deciding whether you may process sensitive personal data.

[Your supervisor can read more about principles for research ethics here.](#)

## **Step 2. What does my supervisor need to register?**

Södertörn University has ultimate responsibility for the personal data processing carried out within its activities and must maintain a digital register of this processing. This also includes the students' examinations and essays/projects. To guarantee individual rights, there are legal requirements that this processing register is kept "organised".

Your supervisor must therefore keep a register of the personal data processing that occurs during examined elements and essays/projects. The purpose is to create an overview of the personal data processing that takes place at the university and, where necessary, to identify the persons responsible for it.

The register may not contain any data from the processing itself, just information that personal data is being processed, why, and who is doing it. The register, which must be shown to the Swedish Data Protection Authority if requested, must be up-to-date. Completed processing must be removed.

For example, your supervisor can keep the completed forms in a folder in their office or in an Excel file where the details are stored digitally.

Remember that this information must be kept updated and be erased when the personal data processing is complete.

The register that you must complete and give to your supervisor is appended. You must provide these details to your supervisor.

An example of a register in Excel is also appended.

Your supervisor decides how they want to keep their register, either as a hard copy or digitally. The most important thing is that all personal data processing at Södertörn University is registered.

### **Step 3. What should I think vis-à-vis information security?**

The GDPR requires that sensitive personal data are processed and stored using the appropriate security measures. The person who has their personal data processed cannot agree to a lower level of security. It is therefore the responsibility of the student and, ultimately, Södertörn University to ensure that collected personal data is processed in a secure manner.

- The most fundamental security measure is never to collect more data than necessary.
- The information collected must therefore be the minimum possible. If it is possible to conduct work using entirely anonymous information, this is preferable.
- Sensitive personal data must never be stored on your personal computer, telephone or tablet. If, for practical reasons, student ICT-suites cannot be used, one option could be to offer the student a loaned computer from InfoCenter.
- It may be possible for the student to process pseudonymised data (i.e. participants' names have been anonymised) on their private equipment. Note that this does not apply to sensitive personal data that has not been anonymised. A precondition for processing pseudonymised data is that the data cannot be directly or indirectly traced to individuals without using a keycode and that the keycode is stored separately and securely by your supervisor.
- Your supervisor must also have made the assessment that processing on your personal equipment does not entail any risk to the integrity of the registered person.
- Pseudonymised personal data is not the same as anonymised data. It is still legally the same as personal data, but the security is considerably better because only the person who needs to make the connection has access to the keycode.

#### **Step 4. What do I do with the personal data when my essay/project is finished?**

Once your essay/project has been graded and completed, the personal data must be erased or stored. You need to think about this with your supervisor now, so that you can provide the correct information to your respondents. In this step, you must evaluate what data should be erased or stored in consultation with your supervisor. If you are in any doubt, you should always contact the archives officer, [arkivare@sh.se](mailto:arkivare@sh.se).

Personal data is normally only used as a basis for examined elements and degree essays/projects, it is rarely included in the written report.

It is therefore important to be able to determine which parts of the preparatory work must be preserved and which must be erased. The basic principle for collected personal data is that they may not be processed for a longer period than is necessary.

At the same time, it is important to be able to prove the conclusions of the finished essay/project, so – in exceptional cases – it may be necessary to preserve personal data after the examined element or essay/project is graded and finished.

What needs to be saved and what should be erased must be assessed for each essay/project.

Data that needs to be preserved must be archived by the university; other data must be erased unless otherwise stated at the time of collection and which received approved consent. If you have any questions, contact the archivist at [arkivarie@sh.se](mailto:arkivarie@sh.se).

#### **Step 5. What do I do if the personal data will be erased?**

Once you have erased (deleted/thrown away) personal data and the relevant forms, you must provide an assurance of this to your supervisor in the form of a record of erasure (see appendix) that you both sign and append to the essay/project. Your supervisor will submit the graded essay/project and the record of erasure to Södertörn University's archive for further management.

#### **Step 6. What do I do if the personal data is to be stored?**

If your supervisor assesses that the personal data you have collected should be preserved for future generations, for example because it contains information of cultural-historical value, you must submit all the collected material for this personal data (e.g. information and consent forms, sound files, transcriptions, name lists) to your supervisor, who will submit this material and the graded essay/project to Södertörn University's archive for further management.

## Step 7. How do I collect consent correctly?

The GDPR requires that anyone who has their personal data processed by the university must have received adequate information, so that they can provide “informed consent”. It must be an “unambiguous indication” by the person.<sup>13</sup>

You must inform the person about how their personal data will be collected, processed and later erased or archived. If the person is unable to make an informed choice on participation in the study or is pressured to participate, their consent is invalid.

It is therefore important that your information and consent form contains enough information and accurately describes how you are going to process the personal data.

It must be as easy for a participant in the study to withdraw their consent as it is to provide it. Your contact details must always be included on the information and consent form.

Consent can be provided orally but must be clearly documented. This could be through a recording or a message written in an email from a named email address.

As you – the student – are collecting the personal data, you must prove that there is documented and valid consent. You are responsible for keeping this consent organised during work on the essay/project and preventing non-authorised persons from accessing it.

Your supervisor may also choose to store the forms for you, either themselves or at the academic school, depending on what is most suitable considering the topic of your essay/project. Once your essay/project has been graded, the forms must be erased or, in some cases, stored (see step 4).

For respondents to questionnaires, it can be more difficult to get a written consent via the form. You therefore need to have clear information on the first page of the questionnaire, see the “Mall för informationstext” (template for information text).

Consent can be considered as having been given when the respondent actively chooses to participate by answering the questionnaire after reading the information text.

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<sup>13</sup> See Article 4(11) of the GDPR for a full definition.

## 5. Step-by-step guide

1. Check that sensitive personal data will not be processed. However, if it will be, the subject that the essay is intended to cover must undergo ethical review. This is done by the supervisor at the academic school.
2. Decide how the information will be stored and, in consultation with your supervisor, ensure that it is processed securely during your work.
3. In consultation with your supervisor, decide which parts of the information will be erased or retained when work is completed.
4. Fill in the information and consent form.
5. Inform and collect consent from every single person who will participate in the study, collect the necessary personal data, and process the personal data in accordance with what was decided in steps 1-5 above.
6. After the essay project has received a pass grade, erase or archive the personal data in accordance with what you decided in step 4.

## 6. Other information

If you have any questions about data protection, you are always welcome to contact the university's data protection officer via [dataskydd@sh.se](mailto:dataskydd@sh.se).

### **Relevant appendices are available on the external website**

1. Exempel på skyddsåtgärder för studenter [example of security measures for students]
2. Blankett för registerförteckning [form for register]
3. Exempel på elektronisk registerförteckning [example of a digital register]
4. Informations-och-samtyckesblankett [information and consent form]
5. Informations-och-samtyckesblankett – känsliga personuppgifter [information and consent form – sensitive personal data]
6. Mall för informationstext [template for information text]
7. Consent Form