

Starting points for drafting a Data Transfer Agreement (DTA)

Before starting, it is important to address who is responsible for the research idea: when the student research is commissioned by the internship organization (i.e. the research question was formulated by the internship organization, *opdrachtonderzoek*), then UU is not allowed to keep a copy of the data collected by the student. If UU wants to have a copy of the data, the supervisor submits a request to the internship organization who is then responsible to draft and provide their own data transfer agreement to us.

For the cases in which the student has formulated their own research question (with some input by thesis and internship supervisors), even if the internship organization facilitates the data collection (e.g. via access to their network), the right to archive the student data belongs to UU. In such cases, if the internship organization wants a copy of the raw data, they need to sign a DTA with UU. The thesis supervisor drafts the DTA (based on the template which can be asked through this email address: privacy-fsw@uu.nl), and sends it for approval to the Privacy & Research Data Management team (also via privacy-fsw@uu.nl), who evaluate the DTA and sign it. The agreement cannot be signed by the supervisor. This needs to be done by the department manager (“afdelingsmanager”). Upon approval of the privacy & data management team, the supervisor sends the agreement to the internship organization. Only then the internship organization is allowed to keep a copy of the data collected by the student.

A number of considerations:

Data shared with the internship organization needs to be anonymized beforehand. This is easier done with quantitative data than with qualitative data. If the data is qualitative, the student is expected to delete the audio-recordings (if any) after transcribing them, and to anonymize the transcripts. In other words: no audio recordings are shared with internship organizations, only anonymized transcripts. The file containing the match between the pseudonyms and the real names of the participants is not shared with internship organizations either. Only the researcher (student) has access to it.

Secondly, if the internship organization is based outside of the EU, data transfer becomes more complicated. In that case, thesis supervisors are advised to contact the privacy & data management team first before filling in the DTA template.

Lastly, the way the data can be used is also specified in the DTA.