

SMARTER-CM sub-study

NATURE-DCM

Transparency Notice – Use of data for future research

This notice relates to the use of the data collected as part of NATURE-DCM for unspecified future research by the team at Imperial College London. We may use information about you. We will only use information that we need for the future research. We will let very few people know your name or contact details, and only if they really need it for this work. These people will include Imperial Research Team members and support staff.

Everyone involved in this research will keep the data collated as part of future research, including your personal data, safe and secure. We will also follow all privacy laws and legislation that are relevant to the specifics of the future research.

We will make sure no-one can work out who you are from the reports we write. The following information pack tells you more about this.

How will we use Information about you?

Research Study Title: SMARTER-CM sub-study – NATURE DCM

Imperial College London is the sponsor for this research and will act as the Data Controller for future studies. Being a Data Controller means that we are responsible for looking after your information and using it appropriately plus are responsible for explaining this to you. Imperial College London will keep your personal data for:

- 10 years after the future research has finished in relation to data subject consent forms.
- 10 years after the future research has completed in relation to primary research data.

For more information / confirmation regarding the end date please contact the study team, see **'WHERE CAN YOU FIND OUT MORE ABOUT HOW YOUR INFORMATION IS USED'** for contact information.

We will need to use information (including personal data and data created as part of the study) from you for future research.

This information will include your NHS number, name, contact details and date of birth. People within the College and study team (see section 'Sharing your information with others') will use this information to do the research or to check your records (see information to be collected) to make sure that the research is being done properly and the information held (such as contact details) is accurate. People who do not need to know who you are will not be able to see your name or contact details. Your data will have a code number instead.

Imperial College London is the sponsor of this research and is responsible for looking after your information. We will keep this information about you safe and secure by:

- Robust pseudonymisation has been implemented to prevent identification

- Access controls have been implemented to ensure only key personnel can access the data.

Some of your information may be sent outside the UK (see section 'International Transfers' and 'Sharing your information with others'). They must follow our rules about keeping your information safe. Once we have finished the study, we will keep some of the data so we can check the results. We will write our reports in a way that no-one can work out that you took part in the research.

LEGAL BASIS

As a university we use personally-identifiable information to conduct research to improve health, care and services. As a publicly-funded organisation, we have to ensure that it is in the public interest when we use personally-identifiable information from people who have agreed to take part in research. This means that when you agree to take part in a research study, we will use your data in the ways needed to conduct and analyse the research study. Our legal basis for using your information under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, is as follows:

- Imperial College London - "performance of a task carried out in the public interest"; Health and care research should serve the public interest, which means that we have to demonstrate that our research serves the interests of society as a whole. We do this by following the [UK Policy Framework for Health and Social Care Research](#)

Where special category personal information is involved (most commonly health data, biometric data and genetic data, racial and ethnic data etc.), Imperial College London relies on "scientific or historical research purposes or statistical purposes".

INTERNATIONAL TRANSFERS

We may share data about you outside the UK for research related purposes to:

- Where necessary to provide access to a data processor / service provider who will utilise your personal data as instructed by us.
- Where necessary to share with a third-party organisation / collaborator

If this happens, we will only share the data that is needed. We will also make sure you can't be identified from the data that is shared where possible. This may not be possible under certain circumstances – for instance, if you have a rare illness, it may still be possible to identify you. If your data is shared outside the UK, it will be with the following sorts of organisations:

- Academic institutions such as universities or collaborators who work in hospitals
- Commercial organisations such as service providers and pharmaceutical companies

We will make sure your data is protected. Anyone who accesses your data outside the UK must do what we tell them so that your data has a similar level of protection as it does under UK law. We will make sure your data is safe outside the UK by doing the following:

- Some of the countries your data will be shared with have an adequacy decision in place. This means that we know their laws offer a similar level of protection to data protection laws in the UK
- We use specific contracts which stipulates that personal data must maintain the same level of protection when outside the UK as it has within the UK. For further details visit the Information Commissioner's Office (ICO) website - www.ico.org.uk

- We do not allow those who access your data outside the UK to use it for anything other than what our written contract with them says
- We need other organisations to have appropriate security measures to protect your data which are consistent with the data security and confidentiality obligations we have. This includes having appropriate measures to protect your data against accidental loss and unauthorised access, use, changes or sharing
- We have procedures in place to deal with any suspected personal data breach. For further details about UK breach reporting rules visit the Information Commissioner's Office (ICO) website - [Personal data breaches: a guide | ICO](#)

SHARING YOUR INFORMATION WITH OTHERS

We will only share your personal data with certain third parties for the purposes referred to in this participant information sheet and by relying on the legal basis for processing your data as set out above.

- Other Imperial College London employees (including staff involved directly with the research study or as part of certain secondary activities which may include support functions, internal audits, ensuring accuracy of contact details etc.), Imperial College London agents, contractors and service providers (for example, suppliers of printing and mailing services, email communication services or web services, or suppliers who help us carry out any of the activities described above). Our third party service providers are required to enter into data processing agreements with us. We only permit them to process your personal data for specified purposes and in accordance with our policies.
- Research Collaborators / Partners in the study who may include:
 - Third Party University
 - Third Party Company
 - Third Party Government department

POTENTIAL USE OF STUDY DATA FOR FUTURE RESEARCH

When you agree to take part in a research study, the information collected either as part of the study or in preparation for the study (such as contact details) may, if you consent, be provided to researchers running other research studies at Imperial College London and in other organisations which may be universities or organisations involved in research in this country or abroad. Your information will only be used to conduct research in accordance with legislation including the GDPR and the [UK Policy Framework for Health and Social Care Research](#).

This information will not identify you and will not be combined with other information in a way that could identify you, used against you or used to make decisions about you.

COMMERCIALISATION

Samples / data from the study may also be provided to organisations not named in this participant information sheet, e.g. commercial organisations or non-commercial organisations for the purposes of undertaking the current study, future research studies or commercial purposes such as development by a company of a new test, product or treatment. We will ensure your name and any identifying details will NOT be given to these third parties, instead you will be identified by a unique study number with any sample analysis having the potential to generate 'personal data'.

Aggregated (combined) or anonymised data sets (all identifying information is removed) may also be created using your data (in a way which does not identify you individually) and be used for such

research or commercial purposes where the purposes align to relevant legislation (including the GDPR) and wider aims of the study. Your data will not be shared with a commercial organisation for marketing purposes.

WHAT ARE YOUR CHOICES ABOUT HOW YOUR INFORMATION IS USED?

You can stop being part of the study at any time, without giving a reason, but we will keep information about you that we already have.

You have the right to ask us to remove, change or delete data we hold about you for the purposes of the study. We might not always be able to do this if it means we cannot use your data to do the research. If so, we will tell you why we cannot do this.

- If you choose to stop taking part in the study (also known as opting out), we would like to continue collecting information about your health from your health records or usual doctors. If you do not want this to happen, please tell us and we will stop.

WHERE CAN YOU FIND OUT MORE ABOUT HOW YOUR INFORMATION IS USED

You can find out more about how we use your information:

- by asking one of the research team
- by sending an email to smarter-cm@imperial.ac.uk

COMPLAINT

If you wish to raise a complaint about how we have handled your personal data, please contact the research team first by sending an email to smarter-cm@imperial.ac.uk.

Following our response, if you are not satisfied please contact Imperial College London's Data Protection Officer via email at dpo@imperial.ac.uk, via telephone on 020 7594 3502 and/or via post at Imperial College London, Data Protection Officer, Faculty Building Level 4, London SW7 2AZ.

If you remain unsatisfied with our response or believe we are processing your personal data in a way that is not lawful you can complain to the Information Commissioner's Office (ICO)- via www.ico.org.uk. Please note the ICO does recommend that you seek to resolve matters with the data controller (us) first before involving them.