* + When should I use this form in my research study?
    - This form should be used when there is a reasonable expectation that research participants will be living in the European Union.
  + Is there any circumstance when I have a reasonable expectation that research participants live in the EU, and I do not need to use this form?
    - Yes, ONLY if the data collection are 100% anonymous via a survey and there is no way to track ISP addresses.
  + Does the level of IRB review matter if I must use this form or not? (Exempt, Expedited, Full Board (Greater than minimal risk)).
    - No, if you are collecting data from a research participant that lives in the EU, regardless of IRB determination of risk, and it is not 100% anonymous, you must use this form.
  + If I already have an informed consent form or an information sheet, do I still have to use this form?
    - Yes. This form should be given specifically to those participants in addition to a consent form or information sheet.
  + Can I simply add in a few lines to my existing consent form or information sheet?
    - No, you must give this form to the research participants living in the EU.
  + What if there is only one participant in my research study that lives from the EU that is answering questions for my research?
    - This form should be used, even for a single participant, in your research study that lives in the in the EU.

Please add this document with the blue highlights filled in, to section 40 of iStar with your IRB submission. Please remove this cover sheet and the highlights when submitting to iStar.

This privacy notice applies to all personal information that the University of Southern California (USC) and the researchers identified in the informed consent process/information sheet about you in connection with your participation in this research project. Personal information is information about you through which you can be identified (including where you can be identified by combining the information with other information). Some of this personal information may include information which is classified as **“sensitive”** under local privacy laws (for example, information about your physical and mental health).

Information collected about you for this research project includes personal information, such as demographic data and may include sensitive data, such as:

* racial or ethnic origin
* political opinions
* religious or philosophical beliefs
* trade union membership
* genetics or biometrics
* health
* sex life or sexual orientation
* criminal record

The legal basis for collecting and processing your personal information is one or more of the following:

* You have consented to the collection and processing of your personal information; and/or
* USC is collecting and processing your personal information to necessary for the performance of a task carried out in the public interest;
* As necessary by law.

Your data will be used and/or stored as long as needed for the research study and consistent with the term of the USC HIPAA Authorization to Use Personal Information for Research Purposes.

## Your Rights

* You have the right to see the information being collected about you in the study. To ensure integrity of the study, you will not be able to review some of the data until after the study has been completed. For example, if you are in a blinded study, neither the researchers nor you will be able to know the study arm in which you participated until after the study is over.
* You have the right to request corrections to your Personal Information if it is inaccurate.
* You have the right to limit the collection and use of your Personal Information under certain circumstances (for example, if you think that the information is inaccurate).
* You have the right to request the deletion of your Personal Information if you are no longer participating in the study. However, there are limits on your ability to request deletion of your Personal Information such as if deletion would seriously impair the integrity or the efficacy of the study or if your Personal Information is needed to comply with legal requirements.
* You have the right to file a complaint with a [data protection authority](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).).

## Withdrawal from the Study

If you withdraw from the study, you will no longer be able to participate in the study. No new information or samples will be collected about you or from you by the study team. Your withdrawal has no effect on the lawfulness of the data processing that occurred prior to your withdrawal.

After your withdrawal, your data and personal information may still be maintained to maintain the integrity of the study, to satisfy any legal or regulatory requirements including reporting and retention requirements, and/or for any other purposes permitted under applicable data protection and privacy laws. Your Personal Information also may be anonymized so that the information does not identify you personally, and such anonymized information may be used for further research.

## Security

We implement technical and organizational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the ongoing integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing. For more information on the appropriate safeguards in place, please contact us at the email address below.

We will retain your personal information in accordance with our [Record Management policy](https://policy.usc.edu/records-management/), which sets out data retention periods required or permitted by applicable law.

## International Data Transfer

Your data will be used and shared with the researchers and sponsors on this research study as well as government regulators and as fully described in the HIPAA Authorization to Use Personal Information for Research Purposes. Your personal information may be shared with individuals outside your country, including the United States, and will be treated in compliance with applicable data protection laws. Data privacy and protection in those countries may not offer the same level of protection as those in your own country.

## Contact Information

If you have questions or concerns regarding the way in which your personal information has been used, please contact us at [insert PI USC email].

## Changes to the Notice

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time. You will be able to see when we last updated the privacy notice because we will include a revision date. Changes and additions to this privacy notice are effective from the date on which they are posted. Where changes to this policy will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (for example, to object to the processing).