

ETHICAL PRACTICES IN PROCESSING PERSONAL DATA FOR RESEARCH

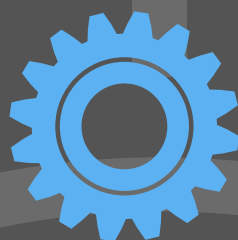


Good researchers follow and comply with ethical standards and compliance of Research.



The person collecting must put himself in the Data Subject's Position

Recognize the Data Subject as an Individual and not merely as a consumer: determine the ethical feasibility of your processing by subjecting yourself to the same procedures: would you consent?



Engineer Privacy-conscious Designs

Technological and Process design decisions should not dictate our societal interactions and the structure of our communities, but rather support our values and fundamental rights. Develop and promote engineering techniques and methodologies that fully respect the dignity and rights of the individual.



Be Accountable for the Collected Data

The principle that personal data should be processed only in ways compatible with the specific purpose(s) for which they were collected is essential to respecting individuals' legitimate expectations.



Think Beyond Consent

Individuals are not merely passive objects requiring protection under the law against exploitation; and not all human behavior can be explained by economic principles that assume human beings are entirely rational and sensitive to economic incentives.



Collect Only What Can be Protected

Individuals today are increasingly required to disclose much more personal information in order to participate in social, administrative and commercial affairs, with ever more limited scope for opting out. With this, the notion of free and informed consent is placed under enormous strain and it becomes necessary to limit collection to proportionality and legitimate purpose.



Treat Personal Information as extension of Physical Individual

The phrase "Once taken, it can never be returned" comes to mind when it comes to assessing risk and opportunity costs. The dignity of the human person is not only a fundamental right in itself but also a foundation for subsequent freedoms and rights, including the rights to privacy and to the protection of personal data. Privacy is an integral part of human dignity, and the right to data protection was originally conceived to compensate for the potential erosion of privacy and dignity through large scale personal data processing.



Acknowledge Ownership of Personal Data

Absolute control over personal data is difficult to guarantee as there will be other concerns such as public interest and the rights and freedoms of others. Control is necessary but not alone sufficient since customers or data subjects are often not fairly compensated for the data they trade.



Safeguarding Human Dignity as Priority

It is necessary to ensure that personally-identifiable information, inclusive of big data, can be easily depersonalized to make it harder or impossible to single out an individual: it is important to evaluate accordingly to the wider societal norms and ethics committees when deciding on a large scope.



Prioritize Pro-Consumer Processing

The Data Privacy Act mandates that in interpreting the law, any and all policies or procedures must take into account the rights of the Data Subjects—the very same rights held by those who are processing their information. It becomes necessary to remember the purpose of holding, collecting, and processing of the personal information.



Evaluate the Purpose for Collection

Even with legitimate purpose, it is vital to check and update current processes as to whether the need to collect has become obsolete.

The processing of personal information for research purposes is exempted from privacy prohibitions as long as the processing of personal information is to the minimum extent

GUIDELINES IN DATA GATHERING AND PROCESSING



01

Unless necessary to accomplish the research objectives, do not collect demographics and personal information from respondents and research subjects such as names, age, contact information, sex, health information, educational information, and other information personal to the individual.

02

Do not use or process gathered data other than the legitimate purposes of the research expressly communicated to the research subject.

03

Unless the prior, expressed, recorded, and informed consent of the research subject was obtained, do not reuse or recycle data for other research, even if related to or arising from the original research initiative. Gathered data should only be processed in accordance with the number of research projects the research subject was made aware of.

04

Research results and output should only contain anonymized or aggregated data. Identities of respondents and research subjects should not be disclosed unless the prior express recorded informed consent of the research subject was obtained.

05

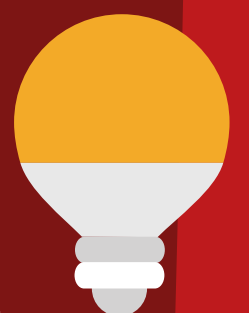
Unless part of the legitimate purpose of the research, there should be no profiling, judgment, or discrimination of the research subject in any manner. This includes psychological, behavioral, medical, physical, financial, racial, sexual, political, social, or any form of profiling, judgment, or discrimination of the research subject.

06

Researchers should keep in mind that research subjects are data subjects whose data must be protected from unauthorized or unnecessary gathering or processing. In case of doubt, data gathering and processing should be to the minimum extent necessary to fulfill the legitimate purpose of the research objective with the least intrusion to the privacy of the research subject.

07

Researchers must be aware of and adhere to applicable ethical standards for research.



Source: Part V Memorandum Ref No. EBM 20-08 of Revised Privacy Policy for Researchers and Research Subjects

