Guidelines for processing personal data in student and researcher projects at the University of South-Eastern Norway

Version no.: 2 Valid from: 01.10.2023

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The University of South-Eastern Norway (USN) has an agreement with Sikt (The Norwegian Agency for Shared Services in Education and Research) that they will pre-assess all student and researcher projects at USN that handle personal data. This means that all such projects must be sent to Sikt for a privacy assessment. Before a project can start, Sikt must have provided an assessment of the handling of personal data.

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1. Introduction

Students and researchers who handle personal data in research projects need to follow these guidelines. These guidelines explain how to register, assess and handle personal data in order to ensure privacy from the beginning to the completion of the project.

These guidelines have been prepared in accordance with Act relating to the processing of personal data (The Personal Data Act) of 20 July 2018. The aim of the legislation is to strengthen the rights of individuals.[1]

In research, privacy principles ensure that all processing of personal data is predictable for research participants.[2]

Personal data will be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date,
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage

It is especially important to note that:

- There is a duty to register and document the processing of personal data. USN has an agreement with Sikt that they will pre-assess all student and researcher projects that handle personal data. This means that researchers and students must report the processing of personal data to Sikt.
- The Regional Committees for Medical and Health Research Ethics (REC) provide an ethical pre-approval of medical and health research projects in accordance with the The Act on Medical and Health Research. Under the Personal Data Act, projects must also be assessed according to whether the processing of personal data is done in accordance with the institution's guidelines. For USN, Sikt makes this assessment. This means that projects that are covered by the Health Research Act must both be approved by REC and assessed by Sikt.

2. What is personal data?

Personal data is all information that can identify a person, either directly or indirectly. For example, names, phone numbers, IP addresses, email addresses, sound recordings, videos or images.

Remember that combinations of background information can indirectly identify a person. For example, if you write where someone comes from, their age and their occupation, it could be possible to find out who the person is.

You should also be aware that even if all the reporting and publishing from the project is anonymous, you may still have processed personal data in your project.

[1] Act relating to the processing of personal data (The Personal Data Act) https://lovdata.no/dokument/NLE/lov/2018-06-15-38 The law is based on the EU's General Data Protection Regulation (GDPR).

[2] Art. 5 GDPR – Principles relating to processing of personal data - General Data Protection Regulation (GDPR) (gdpr-info.eu)

3. About personal data and the obligation to notify

3.1. Research projects and student projects

If you are going to process personal data in your research or student project, you must report the project to Sikt. «Processing personal data means everything from collecting, registering, storing, compiling and disclosing personal data.»[3] If you are unsure about whether you need to submit a notification form, see Sikt's website for more information.[4]

If you process personal data, you must report the project to Sikt. The project must be reported to Sikt even if the personal data is replaced with a number, a code, fictitious names or something else, which refers to a separate list of personal data.

When your notification form has been assessed by Sikt, this serves as documentation that the project processes personal data in a lawful manner. Sikt registers all projects they assess for USN in a database, and in the event of an inspection by the The Norwegian Data Protection Authority, USN can document how personal data is handled by students and researchers.

The project manager[5] is responsible for reporting the project to Sikt. For student projects, the supervisor has this responsibility. The project must be reported no later than 30 days before the data collection is due to start. You are not allowed to start processing personal data before you have received a recommendation that the project can start from Sikt. It is important to remember that you must also inform Sikt when you have completed the project.

The requirement to notify Sikt also applies to student projects, both at bachelor's and master's level. However, the student and supervisor jointly have a duty to assess whether it is actually necessary to collect personal data in order to complete the student project. Sensitive personal data should, as a general rule, not be collected in bachelor projects and should be avoided, if possible, in master's projects.[6]

In addition to getting an assessment from Sikt, all research projects that are covered by the Act on Medical and Health must obtain an ethical pre-approval from the Regional Committees for Medical and Health Research Ethics (REC). The law defines medical and health research, as: "activity that is carried out with scientific methodology to generate new knowledge about health and disease".

Note that you need to specify whether your project processes health information in the notification form to Sikt, but not all projects that process health information have to apply to REK. This is because health information covers all personal data about health conditions, but not all projects that process such information have the intention «to generate new knowledge about health and disease».[7] If you

[3] This is a translated and adapted from Sikt's Personvernordbok. https://sikt.no/personvernhandbok-forskning/personvernordbok

[4] https://sikt.no/en/notification-form-personal-data

[5] The Project Manager is the person who is in charge of the research project. Also often referred to as a "Principal investigator" or "lead scientist".

[6] See Sikt's website for more information about how to carry out a project without processing personal data: Carrying out a project without processing personal data (sikt.no)

[7] English translation of the Act on medical and health research helseforskningsloven---engelsk-endelig-29-06-09.pdf (regjeringen.no)

are unsure whether your project falls within REC's mandate, you can find more information on REC's website or send a request for an assessment to REC.[8]

It is recommended that applications are sent to REC and Sikt at the same time in order reduce the processing time. When you receive a decision from REC, this must be uploaded as an attachment to the notification form to Sikt. Sikt then gives its privacy assessment and a final recommendation as to whether the project can be started.

Additional documented permissions may be required if you are going to conduct research at an institution such as school, prison, hospital, workplace etc.

3.2. Quality assurance projects

Institutions that provide health care, such as hospitals or nursing homes, have a duty to conduct quality assurance, i.e. to evaluate the health care they provide. They should:

• check that diagnostics / treatment / health care actually gives the expected results

• and uncover whether the quality requirements are met.

One way to do this is with quality assurance projects. Quality assurance projects do not research new forms of treatment. They also do not aim at generating new knowledge about health and disease. Quality assurance projects are therefore exempt from the reporting obligation to REC. Quality assurance projects typically evaluate a service (procedure, medication, surgery), the treatment performed by a unit (team, department, hospital), or treatment related to a specific diagnosis.

According to the Act on Medical and Health Research, students are considered health personnel when they perform actions that have preventive, diagnostic, therapeutic, health-preserving, rehabilitative or for care purposes.[9] A student, who is often also employed in an institution that provides health care, can participate in, or carry out, a quality assurance project on behalf of the institution.

The information processed in the project is then called a «quality register»:

A quality register is a structured compilation of journal information, but may also include data from other sources such as questionnaires, interviews, observations, tests and other medical registers that are used to evaluate the health care provided.

The student can provide information to the management of the enterprise when this is necessary for quality assurance, but the information should be anonymized as far as possible.[10] The student must not disclose more information than necessary for the purpose of the project, and the information must be made available without person-specific characteristics unless such information is necessary for specific reasons.[11] The information can only be made available if it is unproblematic from ethical, medical and health professional considerations.

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[8] For more information on whether your research project is covered by the Act on medical and health research, see REC's website, or contact the USN Department of Research, Innovation and Library at forskningsetikk@usn.no. If you are in doubt as to whether you must register your project with REC, you can also submit a request for a pre-assessment.

[9] See the Act of 2 July 1999 No. 64 relating to Health Personnel etc. - regjeringen.no § 48.

[10] See the Act of 2 July 1999 No. 64 relating to Health Personnel etc. - regjeringen.no § 26.

[11] See the Act of 2 July 1999 No. 64 relating to Health Personnel etc. - regjeringen.no § 29.

You can access journal information if you get consent from the patient.[12] It is also possible to apply for exemption from the duty of confidentiality in connection with quality assurance projects.

In internal quality assurance projects, it is the institution that provides health care that is responsible for processing personal data, and it is up to them to determine the purpose and means of the project. However, it is possible to do such a project as a student at USN. Such projects must also be reported to Sikt for recommendation.

Note that the legal basis for processing personal data under GDPR legislation article 6 for quality assurance projects will be «legal obligation», with supplementary legal basis in the Health Personnel Act § 26.

Institutions that provide health care must also facilitate the education of health personnel in cooperation with the educational institutions. If the institution does not want to carry out a student project as a quality assurance project, it may still be possible to carry out the project, as there are several legal bases in the Health Personnel Act for obtaining relevant data for educational purposes.

4. Sound and images

The use of image and sound recordings of people also entails the processing of personal data. This is because both voice and video recordings of someone can be used to identify them.

USN has drawn up its own guidelines for what type of devices should be used to record sound and video.[13]

5. Risk assessment

Personal data cannot be shared with people who should not have access to them, and you must therefore think through how the data should be protected. When filling out the notification form to Sikt, you must describe the risks involved in the processing of personal data and what you intend to do to reduce the risk.

Ordinary security measures include keeping personal data separate from other data, anonymising the data continuously and using access-restricted storage solutions. How secure a storage solution you must use, will depend on the amount and sensitivity of the personal data you are processing. For more about USN's storage solutions for research data, see the library's website about research data.

For larger research projects, a risk assessment may be necessary, i.e. an assessment of data protection needs. The assessment will help prevent undesirable incidents or reduce risks in the processing of personal data. The measures that need to be taken to protect the processing of research data will be proportionate to the actual risk involved as specified in the risk assessment. Key factors in the risk assessment are the scope of the project, the sensitivity of the information and the duration of the project. In addition, you must be aware of the risks and principles associated with the data management:

- Confidentiality: Prevent unauthorized persons from accessing the information.
- Integrity: No accidental or unauthorized alteration of information.

[12] You must in this case be aware of the need to distinguish between the difference between getting consent to confidential information from the legal basis for processing personal data (the latter might be consent, legal obligation, or the public interest). See section 6 on consent.
[13] For more on how to collect and store research data, see https://bibliotek.usn.no/publishing/research-data/

- Availability: The information cannot be lost and is available when access is required (for those who are authorized)

An extended data protection impact assessment (DPIA) will be necessary in particularly invasive projects, such as projects where sensitive personal data is processed on a large scale. These assessments are more comprehensive and must be prepared in cooperation with the institution's management, the data protection officer at USN and Sikt.

6. Consent

Free and informed consent is a fundamental requirement of research ethics when conducting research on human subjects.[14] As a general rule, participation in research projects must be based on documented consent from the participants.

This does not mean that the legal basis you specify in the notification form has to be consent. In many cases, you can use the legal basis "public interest". Please note that even if you use "public interest" as a legal basis, this does not mean that you should avoid obtaining free and informed consent from the research participants. It only means that you want to use a different legal basis for the processing of personal data.

If the basis for processing personal data is consent, research participants cannot be included in a research project until a declaration of consent has been signed. Declarations of consent can be collected electronically. Informed consent involves communication and information that enables each participant, regardless of age and mental capacity, to make an educated decision about whether or not to participate in a research project. Through gathering informed consent you need to provide necessary information about the study and this serves as a formal agreement for each participant to participate.[15]

You must describe how the participant's confidentiality will be protected during the project and when the results are disseminated. This means that you must describe how you will avoid that information about the participants goes astray. As a general rule, informed consent should include information about long-term storage and sharing of anonymised data. For example you could write: "your responses from the questionnaire will in anonymised form be delivered and long-term stored in USN Research Data Archive and made available for reuse for new research purposes and/or teaching."[16]

Key principles for consent:

- Consent must be voluntary.
- Consent must be informed.
- The competence to give consent on the part of persons of legal age may be diminished due to physical or mental issues that obviously make them unable to understand what the consent encompasses.

[14] For more information on this, see the National Research Ethics Committees article on Consent | Forskningsetikk and the guidelines for different research disciplines Guidelines | Forskningsetikk
[15] You can find more information about consent on the following websites Sikt and REK.
[16] You can find more information on the Library website about collecting, storing and archiving research data: Collecting, saving and archiving research data - Biblioteket USN

- Disempowered persons shall, to the extent possible, consent themselves. If this is not possible, the guardian must consent.
- In some special cases, the requirement to consent may be waived. In such cases, the Project Manager is still required to inform the participants that they are processing their personal data, unless there is also an exemption from the duty to disclose this.[17]
- Please make note of the legal basis you use when filling out the notification form. The legal basis for processing personal data is usually consent or public interest.

Consent for minors:

- Health research: Minors between the ages of 16 and 18 can consent unless otherwise stipulated by special statutory provisions or the nature of the measure in question. Consent from parents/guardians is required if the research involves bodily intervention or drug testing. Section 17 of the Act on Medical and Health Research contains more detailed provisions on competence to give consent.
- Other research: Depending on the nature and scope of the project, it is common practice to use the age limit of 15 years for when children can consent to participation in research. If the research concerns sensitive personal data, the age limit is 16 -18 years. For minors (under the age of 18) to be able to give valid consent to the processing of personal data, it is required that they understand the consequences of what they are consenting to. The possibility of such an understanding depends on factors such as the age, nature and type of personal data requested, as well as the purpose of the collection. One always needs to provide information about the relevant age limit when minors are required to provide personal data.
- When including minors, age-appropriate information letters must be prepared that take into account maturity and experience.

Is assessing competence to give consent a difficult topic in your project? Read more about consent on the websites of Sikt, REC, the National Research Ethics Committees and the Norwegian Data Protection Authority.

If in doubt, contact Sikt, REC or USN's Data Protection Officer.

7. Research participants' rights

As long as a person can be identified in the data material, they have the right to:

- be shown what personal data is registered about them,
- to have personal data corrected,
- to request the deletion of personal data concerning themselves,
- obtain a copy of their personal data (data portability); and
- to lodge a complaint with the Data Protection Officer or the Norwegian Data Protection Authority about the processing of their personal data

[17] This can be done by for example providing information about the project on the following website: Personopplysninger i forskningsprosjekter (usn.no)

You must state this in the information letter and consent form. Here you also need to explain how the research participants can easily withdraw their consent.[18] If a research participant contacts you about exercising their rights, you should contact personvernombudet@usn.no.

8. Changes in ongoing research projects

If you are considering significant changes to be made to the project, a notification must be sent to Sikt. If it is a health research project which has been evaluated by REC, an application must also be submitted to REC. The changes cannot be implemented until REC/Sikt has granted the request and provided feedback.

Check Sikt's and REC's website, if you are unsure whether the changes in your project need to be reported.[19]

9. Data breaches and unwanted incidents

Employees and students at USN are obliged to report if there are any deviations from the guidelines for processing personal data. Deviations are here defined as unwanted incidents that may result in breaches of confidentiality, integrity and/or availability of information. In research projects, such discrepancies may, for example, be that personal data goes astray, or that one has not consulted Sikt before starting to collect personal data.

For more information about where and how to report such deviations, see USN's Form for notification of information security or privacy breach - USN Intranett. If you are in doubt as to whether you should report an incident that has taken place, please contact personvernombudet@usn.no.

10. Roles and tasks

If you are a Project Manager (also referred to as "principle investigator" or "lead scientist") on a research project:

- The Project Manager must notify Sikt and, if relevant, also apply for approval from the Regional Committees for Medical and Health Research Ethics (REC). In addition, they must ensure that required agreements for safeguarding information security and privacy are entered into. (For example in the case of transferring data between institutions.)
- The Project Manager prepares the information letter and consent form.
- The Project Manager must inform their immediate superior prior to notification to Sikt/REC, and send them a copy of the notification(s) if they are requested to do so.
- The Project Manager shall carry out a risk assessment and, if necessary, consult with USN's Data Protection Officer; Sikt and/or REK, if it is necessary to carry out an extended data protection impact assessment (DPIA) according to Article 35 of the General Data Protection Regulation.

[18] Even if research participants withdraw their consent, this does not necessarily mean that the personal data must be deleted. This could for example be the case if the information has already been anonymised, or if the processing has been granted based on a different legal basis consent. For health research projects, this is regulated by section 16, second and third paragraphs, of the Act on medical and health research.
[19] On the following site, you can see which types of changes need to be notified to Sikt: Notify changes in the project (sikt.no)

- The Project Manager must prepare a data management plan (DMP). A DMP is a plan for how research data related to a given research project will be handled, both during and after the project. More information and guidance on DMPs are available on the Research Data Group's website.[20]
- The Project Manager must ensure that there is a system for controlling access to active research data if there is a need to protect confidentiality when processing personal data in the project. Please contact forskningsdata@usn.no if you need guidance about this.
- The Project Manager must notify Sikt when the project is completed.

If you are a student or a supervisor of student projects:

- The supervisor acts as Project Manager in student projects on one-year projects, bachelor projects and master's projects
- In PhD projects, the doctoral candidate can be the project manager, but the supervisor must ensure that the candidate complies with the requirements of the Act on Medical and Health Research, follows privacy rules, and has applied to REK, Sikt, or other bodies where necessary.
- The supervisor must assess whether the student project processes personal data, whether such data are sensitive, whether it includes health information, and whether the project falls under the legal definition of medical and health research.
- The supervisor is responsible for assessing whether the planned project complies with USN's guidelines for the use of personal data, and the rules for collecting, storing, and archiving research data.
- As a general rule, sensitive personal data should not be collected in bachelor projects. It should also be avoided, whenever possible, in master's projects, and the usage of such data must be discussed between student and supervisor.
- The supervisor has to consider whether a student project can be carried out without it having to be reported. In other words, they need to consider whether any personal data is processed in the student project (more information in section 11 below).
- The supervisor, or student if the supervisor has approved this, must notify Sikt no later than 30 days before the collection of data is due to start. Students should in close consultation with their supervisor complete the notification form to Sikt and prepare accompanying attachments.
- The supervisor, or the student if the supervisor has approved this, must notify Sikt when the project ends.
- If the project is covered by the Act on Medical and Health Research, the Project Manager must submit an application for pre-approval to the Regional Committee for Medical and Health Research Ethics (REC). In order to apply to REC, a Ph.D. level qualification will normally be required, so the supervisor has to fill the role of Project Manager on doctoral projects that require REC approval.
- The student should have completed the necessary training in information security and privacy before processing personal data in student projects. The supervisor must have ensured that this training has taken place.
- The student should, in consultation with the supervisor, clarify which of USN's solutions for collecting, storing and archiving research data should be used. See section 14 on research data below.

[20] For more information on data management plans, see Data Management Plan - Biblioteket USN

- If you are a teacher at USN and students are going to process personal data in a coursework requirement, you are responsible for consulting and registering the processing of personal data with the data protection officer.

11. Anonymity, anonymised and pseudonymised

It is possible to collect anonymous data if the project uses a questionnaire that does not register the respondent's e-mail or IP address. An anonymous questionnaire also cannot include any questions whereby respondents might be recognizable from the answers they provide. The questionnaire can only be answered once by each respondent, as opposed to, for example, a series of questionnaires that require a key to link the answers. If anonymous data collection is possible in your project, it is always preferable.

Online forms can be completely anonymously, so long as the respondent's email and IP address cannot be linked to the questionnaire. If an online questionnaire has a settings function and you can make sure that the respondent's IP address is not registered, it will be sufficiently anonymised and the obligation to notify Sikt will be waived, if all other conditions are met.

Please note that the rights of research participants, listed above in section 7, do not apply in the case of anonymous surveys. Without personally identifiable information, the questioning is anonymous and it will not be possible to withdraw consent. You can, for example, use the following formulation to inform about this: “Participation in this survey is voluntary and anonymous. If you respond, you have consented to participate. If you do not want to participate, do not respond or submit the survey. If you change your mind while filling out this questionnaire, do not submit the form and delete what you have written. After the form has been submitted, the responses cannot be withdrawn because they have been submitted anonymously and cannot be traced back to you."

11.1. Anonymization

If data is anonymized it means that no individuals can be recognised based on the data material you are left with. If you are anonymizing data, you must evaluate your data material and decide what information you need to remove or rewrite.

Normally, anonymisation entails:

- deleting directly identifiable information, including the link to a key or name list.
- deleting or reworking indirectly identifiable information (for example, by roughly categorizing variables such as age, place of residence, school, etc.)
- deleting audio recordings, photos and video recordings

As a rule, you are allowed to keep anonymous data after the end of the project, but you must ensure that you have reworked the data sufficiently so that no individuals can be recognised. There are also cases when you need to delete all the data, even if it has been anonymised. For example, this would be the case if you have promised the research participants that you will delete the data, or when data owners, such as Statistics Norway, instruct you to delete the entire data set at the end of the project.

Be precise when writing about anonymisation in the letter of consent and information letter. You must ensure that the informants understand that personal data will be processed by a few selected

researchers while the project is in ongoing. Anonymisation will take place at the end of the project and will enable publication and long-term storage of data. USN wishes to facilitate the sharing of research data, for more on this see section 14 on research data.

- Please note that you are not required to delete personal data in your publications or thesis. If you have a scientific justification for publishing personal data, and you have obtained consent from the participants, personal data can usually be published.
- Note that it may also be possible to store data with personal information for further use in research, but in such cases research participants must be informed about this before the project is initiated. Sikt will then be able to provide guidance as to the proposed use, and assess whether the information provided to the participants is sufficient.

11.2. Pseudonymization

Pseudonymisation means that some directly identifying parameters are replaced with pseudonyms, which will still be unique identifiers.

The data is pseudonymised if names, personal identification numbers or other unique characteristics are replaced by a number, code, fictitious name or something similar, which then refers to a separate list with the directly identifying personal data (key). Please note that also indirectly identifiable personal data needs to be categorised into broad categories or removed in order for the data to be considered pseudonymised. Broad categories should here be understood as, for example, regions instead of municipalities or cities, age ranges (10-19 years, 20-29 years, etc.) rather than precise age. The only way to identify individuals in pseudonymised data will be through the name list/ key.

Pseudonymised data can be considered personal data regardless of who keeps the list of names, where and how it is stored.

De-identification means that all personally identifiable characteristics have been removed from the information, so that they can no longer be linked to an individual.

12. Internet Research

If you intend to conduct research on information that has been made available on the Internet, the project must be notified if you are to process personally identifiable information. Examples of processing of personally identifiable data can be the storage of documents from open or closed discussion forums and nicknames of participants from internet forums. Furthermore, direct quotations can be searchable, thus referring back to individuals.

As a general rule, information about the processing of personal data must also be provided in connection with Internet-based research projects, but in certain cases you may be exempted from the duty of disclosure.

You can find more information about Internet research on the SIKT's website and the guidelines on Internet Research published by the National Committee for Research Ethics in the Social Sciences and the Humanities (NESH, 2018).[21]

[21] For more information, see A Guide to Internet Research Ethics | Forskningsetikk

13. Collection of data abroad

If you are a student/researcher at an institution in Norway and intend to collect personal data abroad, you need to apply and report to SIKT/REC in the same way as for data collection in Norway.

Please note that transferring personal data between a Norwegian institution and one abroad requires an agreement between the institutions on data handling. Templates of such agreements are available on USN's intranet, and if you are unsure whether you need to enter into such an agreement, you can contact personombudet@usn.no.

If you are going to travel to a risk country and collect data, USN has the following guidelines: Travel to high-risk countries - use of IT equipment

It is also important to remember that some types of research data transfers are covered by the Export Control Regulations, and USN has its own team that can help obtain a license for knowledge transfer if needed: Threat assessments and export control

14. Handling of research data

USN has guidelines and institutional tools for the management of research data. A key part of processing research data is to classify the data.[22] USN has developed guidelines for Classification and storage spaces (Employees) and Classification and storage spaces (Students) , and on the basis of this assessment, various solutions are provided for where the data should be stored. You can find these in the storage guides for employees and students. Note that it is common for data to change classification over the lifetime of a project and that projects often contain different categories of data.

As a general rule, USN wants to facilitate the sharing of data from research projects. In student projects, the supervisor and student should discuss whether it is desirable to share research data from the student project.

It will often not be possible to share research data that contains personal data from research projects. In such cases metadata forms must be created for these data sets, which contain information about the data material and contact information whereby other researchers can request to be granted access to the data under specified conditions. USN Research Data Archive can be used to publish metadata sets and any data that does not need protection, such as interview guides, questionnaires, etc.

The Project Manager is responsible for all the data that the project collects and uses, and must have access to all research data. The Project Manager is responsible for giving access and keeping track of who has access to the data. The Project Manager is also responsible for handling active research data and for deleting and/or storing data in a satisfactory manner when the project is completed.

The supervisor is formally the Project Manager in student projects. The student is responsible for carrying out tasks according to the agreement with the supervisor.

[22] For more information, see Research data - Biblioteket USN

Active research data is owned by USN as the data controller. This does not apply to student projects unless it is stipulated in the agreement. As a general rule, employees who leave USN must transfer their active data to the research group they are part of. It might also be necessary to notify Sikt and REC of changes to ongoing projects.

No matter what kind of research data you have, whether it is personal data, confidential or not, you must ensure that access and preservation is secure both electronically and physically. The measures must be proportionate to the sensitivity of the material, for example the degree of privacy, commercial interests and intellectual rights. For information to be secure, one must also pay special attention when data is to be deleted in project folders or from external devices such as recording equipment and measuring instruments.

In general, try to be aware of all measures you can use to reduce the risk of accidental, malicious destruction or modification of data.