



This document was last revised 4<sup>th</sup> March 2022; v2

## LONDON BUSINESS SCHOOL'S RESEARCH LAB PRIVACY NOTICE

### Participants and Collaborators

#### Introduction

London Business School (LBS) is committed to protecting your personal information. We, within the London Business School Research Lab want to assure you that we take the responsibility of protecting your privacy and personal data seriously, and have in place reasonable physical, technical and administrative safeguards designed to prevent unauthorized access to or use of your information. LBS (the "School", "We", "Us", "Our") aims to conduct research to the highest standards of research integrity. Our research is underpinned by policies and procedures that ensure we comply with regulations and legislation that govern the conduct of research; this includes the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA). Our Campus office is at:

London Business School  
Regents Park  
London  
NW1 4SA  
United Kingdom

This Privacy Notice explains how we process ('collect', 'use', 'share', 'disclose', 'dispose of' and 'safeguard') personal information that you provide to us or is generated by us through your access to and use of SONA Systems (SONA) and study participation data. It also addresses your rights in relation to the personal data we hold.

This Notice applies together with any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form. For the purpose of any applicable data protection laws enacted in the UK, the Research Lab is the data controller of your personal data on SONA and the individual study researchers are the data controllers for the data you submit during your study participations. You can contact the LBS Data Protection Officer by post to our address as stated above or via email [dpo@london.edu](mailto:dpo@london.edu). This notice was last updated in December 2021 and may be amended from time to time.

#### Who is the London Business School Research Lab?

**London Business School** is a charitable organisation and graduate business school established in the UK by Royal Charter (RC 000721). Founded in 1964, LBS are a member institution of the University of London.

**The Research Lab** is an interdisciplinary lab, open to all researchers at the School who employ behavioural research methods.

#### What services does the London Business School Research Lab deliver?

**The Research Lab** is responsible for providing researchers with a cutting-edge facility to carry out controlled experiments, offering support with online and field studies and other research assistance requests.

## What is Personal Data?

The GDPR defines “personal data or personal information” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This includes information which may not explicitly identify you (e.g. where your name has been removed) but which does make it possible to identify you if it is combined with other information that is readily available. For example, this might be because the information available contains a postcode, your gender and date of birth; in these circumstances it might be possible to identify you by using this in conjunction with other information available elsewhere.

## What personal data do we collect about you?

On SONA, you are asked to provide personal data about yourself in order to create a research participation account. This personal data is kept separate from any data you submit during your participation in our research studies.

The categories below illustrate the personal data requested by SONA in order to create your research participation account and participate in studies:

- your name(s)
- user ID
- email address
- telephone numbers
- date of birth/ birth year
- ethnicity
- biological sex

Research project requirements and objectives may vary considerably, therefore, the type of personal information collected and used will depend on the particular research objectives of the project you are taking part in. Whatever data we collect will always be proportionate to achieving those objectives.

The categories below are meant to illustrate the breadth of the research data collected, which may not apply to all or every research study you participate in.

Biographical, educational and social information, including:

- age
- gender
- gender identity, specifically whether your gender identity is the same as the gender originally assigned to you at birth
- biometric and genetic information
- physiological data
- your religious or political beliefs
- details about your health, dietary requirements, etc
- nationality
- your image and likeness, including as captured in digital images or video recording for studies where this is explicitly stated
- political beliefs
- educational background

- employment history
- race or ethnic origin
- sexual orientation

Any other information relevant to your study participation with the Research Lab or provision of services as part of the Research Lab's proposed research activities. Access to, and the sharing of, this more sensitive personal data is controlled very carefully and you will be specifically informed about this in study consent forms.

All personal information is kept in line with our policies (as listed on page 1 of this document) or any regulatory requirements. Our researchers are asked to anonymise and remove identifiers such as your name and replace this with a unique code or key (pseudonym), or to delete personal information collected as part of their research at the earliest opportunity.

### **How we collect information about you, why we have it and who has access to it?**

Most of the personal information we process is provided to us directly by you.

Via SONA, your personal data is collected at the point at which you complete the form to request creation of your research account. This data is kept in your research account and can be accessed by members of the research lab team staff to invite you to studies you are eligible to participate in. Study researchers do not have access to this data. Via SONA, you also complete prescreen data in order to participate in studies.

Your study data will usually be shared within the research team conducting the project you are participating in, initially in a way that you can be identified as a participant for the purpose of achieving the research outcomes. However, most personal information used in research will be pseudonymized before sharing widely or the outcome is published. You will be made aware in the consent form if there are collaborators that are not employed by the School who will also access your information. For example;

- other individuals similarly engaged in research activities or in research data collaboration. e.g. third parties processing data on our behalf;
- law enforcement agencies and other government authorities where the School is legally required to do so; or
- our advisers where it is necessary for us to obtain their advice or assistance.

The School remains responsible for your personal data and we will ensure there are adequate safeguards in place to secure your information.

The research lab team staff can access study data but would only do so for specific purposes to deliver services relevant to facilitating your study participation or remuneration, to monitor study completion rates, to carry out tasks in SONA that researchers do not have access to, such as adjusting study quotas, or for other research-specific tasks related to the particular study project.

### **What is the legal basis for processing personal data under data protection law?**

Under the GDPR, the principal lawful bases we rely on for processing this information are:

- (a) Your consent.
- (b) Our legitimate interests in relation to academic research.

(c) Processing that is necessary in the public interest for archiving purposes, scientific or historical research purposes or statistical purposes. Such processing shall be subject to appropriate safeguards, in accordance with data protection law. This lawful basis applies for any special categories of data used in research, e.g. for health or ethnicity data.

If we require your consent for any additional uses of your personal information, including your image and more sensitive personal information we will collect it before you participate in the study concerned. You can withdraw your consent up until the point data is analysed (please see below for further information about your rights).

We ensure that it is in the public interest when we use personal data from people who have agreed to take part in research and we have the obligation to demonstrate that our research serves the interests of society as a whole. This means that when you agree to take part in a research study, we will use your personal data for that research only in the ways needed to conduct the research and analyse the data.

## **What are my rights in connection with my personal data?**

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us not to send you marketing communications;
- to require us to correct the personal data we hold about you if it is inaccurate;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you wish to exercise any of your rights under data protection law please contact the Data Protection Officer, London Business School, Regent's Park, London, NW1 4SA, United Kingdom, or via email: [dpo@london.edu](mailto:dpo@london.edu)

If you are not happy with the way your information is being handled by us, or with the response received from us you have the right to make a complaint to the Information Commissioner's Office (ICO): Wycliffe House Water Lane Wilmslow Cheshire, SK9 5AF United Kingdom Tel: +44 (0)303 123 1113 (local rate) Web: [ico.org.uk](http://ico.org.uk)

## **How long will your information be kept for?**

We will retain your personal data for as long as is necessary to conduct a particular research project and/or if we think it will be useful for further research or as necessary to comply with any applicable legal obligations (please see table below).

Research data that is deposited in a data archive at the School or with a third party e.g. the UK Data Archive or Open Science framework will be de-identified before deposit. Any keys to research participants, that is, a list of the research participants and a unique identifier used to de-identify individuals within a research data set will be kept separately from that research dataset while the research is ongoing and destroyed prior to deposit.

	<b>Data</b>	<b>Retention Period</b>
Research Participants	SONA account data	10 years
	SONA prescreen data	Until research participant requests SONA account deactivation or the account is deleted.
	Paper-based consent forms	10 years
	Paper-based remuneration forms	10 years
	Online remuneration payment details	10 years
	Research study data	The retention period agreed for the specific research project or indefinitely, with legitimate reason.

### **Will I be contacted about other research studies?**

In creating a research participation account, you agree to allow the research lab team to contact you about research studies. The frequency of emails sent is dependent on the availability of studies to participate in. The lab team endeavour not to send out more than 2 emails per week.

We do not share your SONA details with any third parties.

If you believe you have received unwanted, unsolicited emails sent by or purporting to be from LBS, please forward a copy of that email with your comments to our Data Protection Officer, [dpo@london.edu](mailto:dpo@london.edu) for review.

Occasionally, researchers may request email contact details within a survey in order to contact you directly about follow up studies, but you will have the choice whether to provide this information or not.

### **Changes to the London Business School Research Lab Privacy Notice**

This Privacy Statement may be updated so you may wish to check it each time you submit personal information to LBS. The date of the most recent revisions will appear on this page. If material changes are made to the Privacy Notice, for instance affecting how we'd like to use your personal information, we'll provide a more prominent notice (including, for certain services, email notification of the changes).

### **Contacting LBS about this Website Privacy Notice**

If you have any questions or comments about this Privacy Notice, please contact: [lab@london.edu](mailto:lab@london.edu) London Business School Regent's Park, London, NW1 4SA, United Kingdom.