

# Retaining Personal Data

## Overview for DCU Researchers

Data Protection Unit (DPU)

June 2021



**This overview summarizes a number of issues for researchers to consider in relation to the retention of personal data (PD) in a research context. Please note that this overview does not constitute legal advice nor provide comprehensive detail, but it may be used as an initial point of reference when considering how to ensure PD is retained lawfully and in compliance with the General Data Protection Regulation (GDPR) within a research context.**

### Personal Data

Will the research project involve the collection, creation or processing of personal data?

*Personal data is information relating to a living individual where that person is identified or could be identified, either from the data itself or when combined with other data.*

Where the answer to the above question is 'Yes', then GDPR requirements apply.

### Can the personal data be fully anonymized?

GDPR does not apply to anonymous data.

However, researchers must be mindful that it will not always be possible to fully anonymize personal data. In such cases GDPR will continue to apply and researchers must ensure compliance.

Please note that pseudo-anonymized data is still regarded as personal data under GDPR.

### Storage Limitation Principle

One of the mandatory principles of GDPR is Storage Limitation.

The principle states that, in general, researchers must ensure that personal data is kept for no longer than is necessary for the purposes for which the personal data was originally obtained.

### How long?

The duration of the PD retention period is specific to the particular research project and context and will vary from project to project.

The duration is determined by reference to the original purpose of the research project. To assist in determining the duration, it may be useful to consider utilizing the Data Protection Impact Assessment (DPIA) process or completing a Personal Data Security Schedule (PDSS). These are available from the DPU's web pages.

### Other considerations

The Storage Limitation principle applies in conjunction with each of the other data protection principles and requirements under GDPR.

There are very limited exemptions to the retention principle of GDPR which may apply in certain circumstances (such as archiving PD for specific purposes).

If you wish to establish whether one of the exemptions may apply, we advise discussing this with a member of the DPU first.

### DPU Contact Details

E: [data.protection@dcu.ie](mailto:data.protection@dcu.ie)

### Resources & Assistance

[Data Protection Unit Webpage](#)

[Online Training on Data Protection](#)

(Log into Loop as normal using your staff login details and select the 'Data Protection Course' module.)

[List of 'GDPR Data Advocates'](#) across the DCU Community