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Authorization No. 15/2018

New University of Lisbon - National School of Public Health, NIPC 501559094,

notified the National Data Protection Commission (CNPd) of a processing of

personal data for the purpose of conducting a Non-Intervention Clinical Trial,

called Study of occupational exposure of health professionals to

sevoflurane in a hospital setting. , with Protocol No. NA.

The participant is identified by a code specifically created for this study,

constituted in such a way as not to allow the immediate identification of the data subject;

in particular, no codes are used that match the serial numbers.

identification, name initials, date of birth, telephone number, or result

of a simple composition of this type of data. The encryption key is only

known to the investigator(s).

The express consent of the participant or his/her legal representative is collected.

The information is collected directly from the holder.

Any transmission of information is carried out by reference to the code of the

participant and, to that extent, anonymous to the recipient.

The CNPD has already commented in Deliberation No. 1704/2015 on the legal framework,

the grounds of legitimacy, the applicable principles for the correct fulfillment

of Law No. 67/98, of October 26, amended by Law No. 103/2015, of August 24,

hereinafter LPD, as well as on the conditions and limits applicable to the treatment of

data carried out for the purpose of clinical investigation.

In the present case, the treatment that is the subject of the notification falls within the scope of

of that decision and the person in charge expressly declares that he complies with the limits and

conditions applicable under the LPD and Law No. 21/2014, of 16 April, as amended

by Law no. 73/2015, of June 27 – Clinical Research Law –, explained in the

Resolution No. 1704/2015.

The basis of legitimacy is the consent of the holder.

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The information processed is collected in a lawful way, for a specific purpose, explicit and legitimate and not excessive – cf. lines a), b) and c) of no. 1 of article 5 of the LPD.

Thus, under the combined provisions of paragraph 2 of article 7, paragraph a) of the paragraph 1 of article 28 and article 30 of the LPD, as well as paragraph 3 of article 1 and paragraph 9 of article 16.<sup>o</sup> both of the Clinical Investigation Law, with the conditions and limits explained in CNPD Deliberation No. 1704/2015, which are hereby given as reproduced, the present processing of personal data is authorized in the following terms:

Responsible – Universidade Nova de Lisboa - National School of Public Health

Purpose – Clinical Study without Intervention, called Exposure Study

occupational therapy of health professionals to sevoflurane in a hospital environment. , as

Protocol No. NA

Category of personal data processed – Participant code; age/date of birth; genre; anthropometric data; clinical history data; relating to professional activity in connection with Research

Exercise of the right of access – Through the researchers, in writing communications, interconnections and flows

cross-border personal data

identifiable in the recipient – There are no

Maximum data retention period – The key that produced the code that allows the indirect identification of the data subject must be deleted 5 years after the

end of the study.

LPD and the Clinical Investigation Law, under the terms and conditions set forth herein

Authorization and developed in CNPD Deliberation No. 1704/2015, result

obligations that the person responsible has to fulfill. These must be made known to all those involved in the processing of personal data.

Lisbon, 02-01-2018

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The president

Filipa Calvão