Course 7 – Case 2

Pseudonymization is a technique that is used to reduce the chance that personal data records and identifiers lead to the identification of the data subject whom they belong too.

Let’s take a scientific research in healthcare, whereby data subjects are requested by their physician if they want to join the research program. With medical research and personal medical data we are in the context of special categories of personal data which need to be more protected. When your doctor asks you to join such a program you typically have other parties involved: for instance, the hospital and the research lab, pharmaceutical companies, depending on the scope of the research.

The research lab doesn’t need to know who you are, it just needs to conduct the research tests based upon specific personal data. The hospital normally doesn’t need all data either, although it can have loads of data of course, for instance in the scope of an electronic health records program*.* Yet, strictly speaking the hospital doesn’t need to know where you live, for instance, if in the scope of this research program it is a scientifically involved party or conducts some basic tests which the test lab will need and not supposed to contact or know you.

These are types of circumstances where pseudonymization comes in. The research lab can only see what it needs to in order to conduct the tests. The hospital theoretically only needs to see what it needs to see, for instance the name and address of your doctor in order to know where to send the results and maybe the results of some preliminary tests it conducts in order to provide the test lab the ‘material’ it needs. The doctor/physician sees everything. So, just as pseudonymization goes in one direction, the reversal of it, *de-identification,* goes in the opposite direction and that is made possible with strict agreements, rules, mentioned additional measures and of course the possibly to retrieve the data from those pseudonymized fields, using the identification key.