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Approved By	
Approval Date	
Review Date	

1. Introduction

The Biomedical Research and Training Institute (BRTI) is committed to protecting the privacy, confidentiality and dignity of all individuals whose data are collected, stored, or analysed as part of our research. This Privacy Notice explains how we collect, use, store, share, and protect personal information obtained during the conduct of research activities. The notice is issued in accordance with the Cyber and Data Protection Act [Chapter 12:07] and the Cyber and Data Protection (Licensing of Data Controllers and Appointment of Data Protection Officers) Regulations, 2024 (SI 155 of 2024). It is also harmonised with the principles of the EU General Data Protection Regulation (GDPR) and ICH-Good Clinical Practice on data confidentiality, integrity, and participant protection.

2. Who we are

The Health Research Unit Zimbabwe (THRUZIM) is a research unit under the Biomedical Research and Training Institute (BRTI) that conducts public-health and social science research across Zimbabwe in partnership with national and international collaborators. For purposes of data protection law, BRTI is the Data Controller, responsible for determining the purpose and means of processing personal data. Our operations are licensed under Section 3 and 4 of SI 155 of 2024 and supervised by the Data Protection Authority-(POTRAZ).

3. What data we collect

Depending on the specific study, we may collect:

- Personal identifiers (e.g., study ID, age, sex, residence, contact details)
- Health and clinical information (e.g., TB, HIV, diabetes, mental-health data, laboratory and treatment results)
- Socio-demographic and behavioural information
- Opinions and responses to questionnaires or interviews
- GPS, digital, or biometric data (only where essential and ethically approved)

We ensure that data collected are adequate, relevant, and limited to what is necessary for the research purpose, in line with Section 7(1)(a–b) of the CDPA (Chapter 12:07), UK GDPR and ICH-Good Clinical Practice (GCP).

4. How and why we process personal data

Personal information is collected directly from participants or extracted from authorised clinical records by trained research staff. Data are processed for purposes of:

- Conducting scientific and public health research
- Evaluating and improving healthcare services
- Fulfilling ethical and regulatory obligations
- Contributing anonymised results to publications and public-health reports

Processing is lawful, fair and transparent as required under Sections 8 and 13 of the CDPA, GDPR and ICH-GCP, and is based on one or more lawful grounds:

- Participant consent (Section 10(1))
- Public interest or scientific research purposes (Sections 10(3)(d) and 11(5)(g)); 12(3)(i) or
- Legal or ethical obligations under Zimbabwean public-health laws

5. Use of sensitive and health related data

Some studies involve the collection of health, genetic, or biometric data, which are classified as sensitive data under Section 11 and 12 of the CDPA. These are processed only:

- With the participant's written consent, or
- Where necessary for scientific research or public-health purposes and approved by an accredited ethics committee, as provided for under Section 12(3)(c) and (i) of the CDPA.

All such processing is carried out under the responsibility of qualified health professionals and in compliance with confidentiality obligations set out in CDPA Section 12(7) and the ICH-GCP guidelines.

6. How we store and protect your data

BRTI-THRUZIM implements strong technical and organisational security controls as required by Section 18 of the CDPA, Section 16 of SI 155 of 2024 and UK-GDPR. These include:

- Encryption of all digital records
- Role-based access control and password protection
- Secure data servers hosted in compliance with POTRAZ-approved standards
- Locked physical storage for paper records
- Data protection impact assessments for high-risk processing

Data breach detection and reporting procedures are in place, and any confirmed breach will be reported to the Data Protection Authority within 24 hours as required under SI 155 Section 17(1).

7. Data retention and archiving

Personal data are retained only for as long as necessary to fulfil the research purpose, comply with legal obligations, or meet funder and ethics-committee requirements. Normally, research data are kept securely for five to ten years after study completion and then anonymised or deleted under DPO supervision, in line with Section 7(1)(c) of the CDPA and institutional retention policies.

8. Data sharing and transfers

De-identified or anonymised data may be shared with authorised collaborators, research partners, or sponsors under data-sharing agreements that ensure equivalent protection. Any international transfer of personal information will comply with Part VII (Sections 28-29) of the CDPA, ensuring the recipient country provides adequate data-protection safeguards. Identifiable data will not be shared with third parties without consent or a legal basis.

9. Rights of data subject

Under Section 14 of the CDPA and Section 10(4)(d) of SI 1155 data have the right to:

- Be informed of how their personal information is used
- Object to certain types of processing
- Withdraw consent at any time, where applicable
- Request deletion of unlawfully held data

10. Children and vulnerable participants

When data are collected from participants under 18 years of age or from individuals who cannot provide informed consent, we obtain parental or legal-guardian consent and verify such authorisation as required under Section 26 of the CDPA, Section 10(5)(a–b) of SI 155 and ICH-GCP. Safeguards are implemented to ensure minimal data collection and protection of minors' privacy.

11. Updates to this notice

This Privacy Notice may be updated from time to time to reflect new legal requirements or changes in research practice. The latest version will always be available on the THRUZIM-BRTI website and within research clinics.

12. Contact and complaints

If you have questions or concerns about how data are handled, please contact:

Data Protection Officer (DPO) or Data Management Director, BRTI-THRUZIM

Email: tnyengerai@brti.co.zw | tbandason@brti.co.zw

Telephone: +263-778881013

Address: 8 Ross Avenue, Belgravia, Harare, Zimbabwe

If you are unsatisfied with the response, you have the right to lodge a complaint directly with the Data Protection Authority (POTRAZ) as provided under Section 6(1)(g-i) of the CDPA.

Compliance Statement

BRTI-THRUZIM upholds the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, integrity and accountability as defined under the CDPA, SI 155 of 2024 and UK-GDPR, while adhering to the ethical and operational standards of ICH-Good Clinical Practice.