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**MEMORANDUM TO:** Principal Investigators, Research Staff, and Department/Research Administrators **DATE:** 7/18/18

**FROM:** Anne Klibanski, MD, Partners CAO  
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**SUBJECT:** EU General Data Protection Regulation (GDPR) Update #2

**Training Reminder:** If you have not had an opportunity to review the GDPR training overview posted on the *Research Navigator*, we encourage you to do so at your earliest convenience. The [training materials](#) provide an excellent overview of requirements and what may change for Principal Investigators with EU collaborations and/or data collected from individuals within the EU.

**Information Security Assessment:** Some of you have already met with the GDPR team for a preliminary legal and IS assessment. Thanks very much for participating; these meetings have been very helpful in formulating the initial Partners risk assessment.

The GDPR team has concluded that, in the short term, in-depth, GDPR IS assessments are necessary for labs/departments/centers/individual investigators across Partners that interact with EU sites and collaborators on a regular basis or have received (or will be receiving) data from EU sites since the GDPR implementation date. These groups/individuals have been identified by the GDPR team based on an Information Security risk assessment and consultation with the hospitals. Partners Research Compliance will be contacting the individuals/groups to schedule a two-hour meeting with consultants to gather the necessary information. Meetings will begin in mid-August and continue for six weeks. The information gleaned from these assessments will inform the Partners GDPR compliance program and may impact specific IS activities within the departments/individuals contacted. Once the assessments have been completed and we have a report from the consultants, we will provide additional information to the research community and any next steps that may be necessary. The next steps may include IS assessments in an additional cohort of labs/individual investigators.

**Website Privacy Notice:** The GDPR team has drafted a GDPR-compliant website privacy notice for use by research websites. Within the next two weeks, the notice with instructions will be circulated to the approximately 900 research labs/departments/centers with Partners-managed websites or websites housed in Partners data centers. Questions concerning the privacy notice and its implementation should be sent to the Information Security mailbox: [CISPO@partners.org](mailto:CISPO@partners.org).

Thank you for your attention to this very important matter.