

Deliverable 2.1

IDENTIFICATION OF GDPR, SECURITY NEEDS AND SHIPMENT BOTTLENECKS

of Remote NMR (R-NMR):

Moving NMR infrastructures to remote access capabilities



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CONTENTS

COl	NTENTS		
1.	Introduct	ion	
2.	GDPR - I	Background	
3.	GDPR - I	Personal data versus sensitive personal data	
4.	GDPR - S	Survey Implementation7	
5.	Summary	v of GDPR Procedures – Responses on personal data (Survey Questions 3-7)7	
6.	Summary of GDPR Procedures – responses on handling sensitive personal data (Survey		
Que	stions 8-18	8)	
7.	GDPR - H	Final Comments and Next Steps9	
8.	Sample S	hipment – Background 10	
9.	. Sample shipment – collection of information		
10.	Key fir	ndings from sample shipment survey11	
11.	Key fir	ndings from NMR Users' survey12	
12.	Sample	e Shipment – Final Comments and Next Steps	
App	endix 1	Participant Information Sheet and Survey14	
App	endix 2	Responses to Survey Questions 1-8 and 19	
App	endix 3	Responses to Survey Questions 8-18	
App	endix 4	Responses to Internal Sample Shipment Survey45	



1. Introduction

Deliverable D2.1 within Work Package 2 is entitled "Identification of GDPR, security needs and shipment bottlenecks". This report is divided into two sections, one focussing on GDPR as it relates to NMR facilities and the other focussing on sample shipment to/from NMR Facilities. In both cases, information on current practices was collected from the NMR community; for GDPR this was done via an online survey distributed widely to European NMR facilities while for sample shipment this was done via an online questionnaire completed by Remote-NMR participating facilities and from responses to certain questions within the NMR User Survey conducted in early 2023 (Milestone 2.2). With respect to security needs, here the focus is on data security as required by the GDPR and security/safety of samples shipped to NMR facilities. More general consideration of data security needs will be addressed in WP3 and WP4 in the future. The information on GDPR and sample shipment presented in this report will be of use of informing the future work of other aspects of the Remote-NMR project (WP2 and WP3) and will also be of use in defining the table of criticalities for remote NMR access to be included in Deliverable D2.2 in December 2023.

2. GDPR - Background

This work has been carried out in the context of Task 2.3, "Review of GDPR (General Data Protection Requirement) aspects".

GDPR is a regulation in EU law that governs data protection and privacy. It is essential that defining a common procedure for remote access to NMR spectrometers meets GDPR requirements with respect to the data that is collected and stored at each NMR facility, and how that data is shared with users. In order to assess this, NMR facilities were asked to complete a brief online questionnaire outlining their current GDPR procedures and any other data privacy requirements in place locally; the survey was conducted anonymously but information about the country in which the NMR facility is located was collected.

The survey provides insight into how well the GDPR is established at NMR facilities and will serve as a basis for discussions on the implementation of GDPR at different levels of the academic hierarchy (i.e. at University level, Departmental level and NMR Facility level).



3. GDPR - Personal data versus sensitive personal data

GDPR applies to the processing of personal data. Personal data is any information that refers to an identified or identifiable natural person. What is crucial is that the information on its own or in combination with other information can be linked to a living person. Typical personal data is:

- a personal identity number
- a name
- an address
- an email address

GDPR stipulates that a person can request to be informed about their registered data and to have their registered personal data deleted.

Certain personal data is by its nature particularly **sensitive** and therefore has stronger protection. This type of data is called sensitive personal data. Processing of sensitive personal data is as a rule prohibited but there are certain exceptions. Sensitive personal data is data concerning:

- ethnic origin
- political opinions
- religious or philosophical beliefs
- membership of a trade union
- health
- a person's sex life or sexual orientation
- genetic data
- biometric data that is being used to uniquely identify a person.

From an NMR perspective, analysis of human biomaterial (biofluids, tissue, extracts from tissue, *etc.*) can generate information, for example, on health or drug abuse, *i.e.* sensitive personal data, if that data can be traced to a person. A coded sample can still be traced through a pseudo-anonymized coding list. Truly anonymized samples cannot be traced to a person and as such are not subject to the GDPR.



4. GDPR - Survey Implementation

The survey was designed in consultation with WP2 partner UGOT. The survey was approved by the Oxford Central University Research Ethics Committee (CUREC Reference R77838/RE003) and implemented in the Jisc online survey software. A copy of the survey, including the Participant Information Sheet, is available in Appendix 1. Responses to the survey are included in Appendix 1 and Appendix 2.

The survey was sent out to all R-NMR participants, to facility managers and NMR PIs who responded to the initial R-NMR survey sent out in November 2022, and to some national NMR facility manager email lists. Invited participants were asked to coordinate to avoid multiple responses from a facility. All facilities are located in countries where the GDPR, or an implementation of GDPR, applies. The survey opened on June 19 and two reminder e-mails were sent out before the survey closed on June 27. The survey was divided into two parts. The first part introduced the concept of personal data and associated basic requirements. The second part introduced the concept of sensitive personal data and additional requirements associated with this class of data.

5. Summary of GDPR Procedures – Responses on personal data (Survey Questions 3-7)

The survey was completed by **79** NMR facility managers. They represent NMR facilities in **19** European Union countries and **3** other countries, Israel, Norway and the United Kingdom (Q3). The highest number of survey participants are based in Germany and the United Kingdom (**17** responses each). Four or more responses were obtained from Austria (**4**), Denmark (**4**), France (**6**) and Italy (**7**). The full responses to Questions 1 to 8, which were completed by all participants, are included in Appendix 2.

The general awareness of the GDPR is high (Q4). Only 5% of facility managers were unsure whether GDPR applied in the country where their facility was located.



A majority (67%) of the facilities kept a register of their users (Q5) and could provide all information about the user if requested to do so (Q6). A slightly higher fraction (71%) of facilities could delete personal data upon request (Q7).

On the other hand, a sizeable number of facilities did not keep a registry of their users (31%, Q5), could not provide registered personal data if requested to do so (20%, Q6), or did not know if they could (13%, Q6), and could not delete personal data if requested to do so (9%, Q7) or did not know if they could (20%, Q7).

6. Summary of GDPR Procedures – responses on handling sensitive personal data (Survey Questions 8-18)

The survey also asked whether facilities handled sensitive personal data (Q8). The vast majority of facilities (**70** facilities, 89%) responded "No" to this question, and the survey ended for these facility managers after they had the opportunity to enter any additional information in Q19. Seven facilities (9%) do handle sensitive personal data whereas two facility managers (2.5%) were not sure. These **9** facility managers were asked the remaining questions (Q9 – Q18). The responses to Q9 - Q18 from the **2** facilities who were not sure about whether they handle sensitive personal data where, for the most part, "Don't know"; these responses are not analysed further. The responses to Q9 - Q18 for the **7** facilities that do handle sensitive personal data are analysed in more detail below and are included in Appendix 3.

From the responses of Q9 to Q13, it can be concluded that the procedures for handling sensitive personal data are relatively well established at the facilities that process sensitive personal data. Seven (7) facilities <u>handled</u> meta-data, **6** facilities <u>acquired</u> NMR data, **7** facilities <u>stored</u> data, **6** facilities <u>analysed</u> data and **5** facilities <u>transferred stored</u> data in a manner that complies with the GDPR.

The legal responsibility associated with the handling of sensitive personal data appears to be less well understood by facility managers (Q14 and Q15).

Of the facility managers who had indicated that their facility did handle sensitive personal data (Q8 yes), **3** responded that they had the role of personal data controller at their facility (Q14) P a g e 8 | 13D2.1 –Identification of GDPR, security needs and shipment bottlenecks



and that they were aware of the legal requirements associated with this role (Q14b), **1** knew they were not the personal data controller, but did not know who the responsible person was (Q14a), and **2** did not know if they held the role of personal data controller at their facility.

Three (3) facility managers are active in the role as personal data processor (Q15) and are aware of the legal requirements associated with the role (Q15b), 1 knew they were not the personal data processor and did know who the responsible person was (Q15a), and 3 facility managers did not know if they act as personal data processors.

Only two (2) facilities report the use of the Bruker IVDr concept (Q16). Neither has signed an agreement for data sub-processing (Q16a).

Five (5) facilities indicated that they delete sensitive personal data after a fixed period of time (Q18). No facility had permission to keep data for an extended period (Q18a).

7. GDPR - Final Comments and Next Steps

The general awareness of the GDPR is relatively well established among the 79 participating facilities. It seems unlikely, though, that 30% of the responding facilities do not keep track of their NMR users, and their contact details, in some form. The response to Q5 probably reflects an uncertainty about what personal data actually includes and how GDPR relates to this information.

For sensitive personal data, the more detailed written comments (see summary of Q19 at end of survey) also reflect an uncertainty about whether the handled data is truly anonymous, and thus outside the scope of the GDPR, or not (see *e.g.* comments 8, 9, 11, 15, 18). The focus here seemed to be whether data and person could be matched at the *facility* (it could not), not whether data and person could be matched *at all* (it could). This reasoning points to a confusion about proper guidelines and procedures. The uncertainty about legal responsibilities (Q14, Q15) and some of the more detailed comments (*e.g.* 1, 3, 9, 14, 17) again reflect an uncertainty in these matters.



This points to the overarching responsibility of the legal entities, usually universities and specifically university administrations, hosting the NMR facilities. This is the ultimate source from which proper guidelines and information on operating procedures under the GDPR must be obtained. This should not have to be re-invented at the NMR facility level.

Deliverable D2.2 (Remote-NMR landscape including a table of criticalities) is due at the end of Month 18 of the project (December 2023). A 'Fact Sheet and Guidelines on GDPR as it relates to NMR Facilites' will be produced and this will be available on the R-NMR website to all NMR Facilites and this can serve as a starting point for facilities to ensure that their procedures are complying with GDPR.

8. Sample Shipment – Background

This work has been carried out in the context of Task 2.4, "Transnational sample shipment" and represents a collaboration of the CIRMMP and UOXF teams.

Although NMR spectrometers can be accessed remotely, the samples need to be transported to the NMR facility and inserted into the NMR spectrometer. This can be an important factor in determining whether users are able/willing to use remote access. Users may be unwilling to send valuable samples via a courier because of concerns about sample damage. The requirements will be different for solution and solid-state NMR and will also depend on the type of material being studied. The importance to users of having samples returned to them after data collection must also be considered.

9. Sample shipment – collection of information

In order to collect data pertaining to sample shipment, an internal survey involving all R-NMR partners was carried out. The R-NMR consortium's NMR facilities were asked about how NMR samples were handled, how sample shipments were made, and the standard operating procedures that were followed (Appendix 4). Additional information, specifically about the NMR users' attitudes to and experiences with sample shipment, was obtained from questions



included in the NMR Users' survey (Task 2.2) conducted earlier in 2023 (M2.2 User Survey Report <u>https://r-nmr.eu/category/outcome/</u>).

10. Key findings from sample shipment survey

The information provided in the internal survey has allowed us to confirm that the facilities who responded handle samples for all types of biological (BSL2) and chemical applications, and that they all receive shipped samples (of all kinds) in the range of tens per year, despite the fact that the most typical delivery mode is by the users themselves (i.e. in person).

The fact that most facilities lack defined procedures for sample shipment and do not provide users with written instructions on how to package samples for shipment is highlighted as a bottleneck. This is something that can be addressed in Months 13-18 of WP2; a standard set of guidelines for sample shipment can be included in the table of criticalities that will be part of Deliverable D2.2 in Month 18.

All NMR facilities ask visitors for instructions on how to handle and store samples that are shipped to them. This, it seems, requires that a technician in the facility takes care of the sample after receiving it and potentially represents additional work for NMR facility staff. However, it may also be the case that in some NMR centres, samples must be shipped in a specific format but this requirement is not properly documented at present.

With respect to sample quality control and the rejection of some samples arriving at facilities, it appears that currently facilities have not put in place consistent practices to assess samples after delivery.

R-NMR partners' facility managers were also asked to indicate their preferred courier for sample shipment. While the majority indicated DHL, a comparable number did not have a preferred courier. The avoidance of sample shipment, even when it is possible, is the result of a fear of delays due to variety of possible reasons, ranging from worry about loss of a package, to worry about sample deterioration during travel, to worry about delays at customs. In the latter case, guidelines for creating better documentation would be helpful to NMR users and facilities.



11. Key findings from NMR Users' survey

What emerged from this internal survey, as described above, is very consistent with the outcome of the NMR Users' survey (M2.2 User Survey Report <u>https://r-nmr.eu/category/outcome/</u>). In the latter, about half of the respondents specified that they did not use remote access. Within this group, 113 users (43%) considered sample shipment/delivery to an NMR facility to be a barrier to remote spectrometer access (Q11d User survey). In particular, for 67 users the main concern was sample degradation, while an additional 35 replies indicated worries about sample loss (Q11d.i User survey). A further related obstacle is that there are a variety of experimental setups where the samples need to be prepared immediately before the data collection (e.g. for kinetics investigation). Interestingly, among the users who did use remote access to an NMR facility during or after the pandemic, only 29% thought that sample shipment was a problem (Q18 User survey). However, in the large majority of cases (87%) remote users did not ship the samples but delivered them personally either to a facility staff member or at a drop-off location (Q16 User survey).

12. Sample Shipment – Final Comments and Next Steps

The internal survey of R-NMR participant NMR facilities and the larger survey of NMR Users has provided useful insights into current practices relating to sample shipment and also the NMR user community experiences and concerns relating to sample shipment.

There are several areas related to sample shipment with an apparent lack of standard operating procedures in place at NMR facilities and/or a lack of information readily available to NMR users. This includes a lack of defined procedures for sample shipment and handling of samples upon arrival at a facility, a lack of written instructions on how to package samples for shipment, a lack of standard procedures for sample quality control upon delivery to a facility. The lack of these standard procedures may be creating a bottleneck for sample shipment that holds some users or NMR facilities back from widening remote NMR access. A solution to some of these problems which involves the definition of best practice with respect to sample shipment/handling and the community-wide adoption of these guidelines would be a benefit to the NMR community. This is something that can be addressed in Months 13-18 of WP2; a



standard set of guidelines for sample shipment/handling can be included in the table of criticalities that will be part of Deliverable D2.2 in Month 18.



APPENDIX 1

Remote-NMR (R-NMR): Moving NMR infrastructures to remote access capabilities

GDPR SURVEY (19-26 June 2023)

Univ. of Oxford Central University Research Ethics Committee Approval Reference: [R77838/RE003]

PARTICIPANT INFORMATION SHEET AND SURVEY



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Remote-NMR (R-NMR): Moving NMR infrastructures to remote access capabilities

PARTICIPANT INFORMATION SHEET

Central University Research Ethics Committee Approval Reference: [R77838/RE003]

1. Introductory paragraph

Prior to the Covid19 pandemic, the overwhelming majority of NMR data collection was conducted by scientists traveling to local, national and transnational NMR facilities and sitting directly in front of the NMR console to setup data collection. The experiments were often set up together with experienced staff to ensure sample integrity, best conduct of experiments, interactive planning and peer teaching, and initial analysis of acquired data to assess the correct outcome of the experiments. Due to the lockdown restrictions in many countries during 2020-2021, this scenario had to change dramatically. The experiences of several European NMR facilities during the Covid19 pandemic have shown that remote access is feasible within the field of NMR spectroscopy. It is the aim of the Remote-NMR project to develop and exploit this type of access in full.

You are being invited to take part in the R-NMR project because you are a manager of an NMR facility who may be able to provide information about GDPR (General Data Protection Requirement) procedures in your NMR facility. Before you decide to participate in the survey, it is important for you to understand why the research is being done and what it will involve. Please take time to read the following information carefully and discuss it with others if you wish. Ask us if there is anything that is not clear or if you would like more information. Take time to decide whether you wish to take part.

2. Why is this research being conducted?

Remote access to NMR spectrometers has been implemented successfully at several NMR facilities around the EU/UK during the Covid19 pandemic. The R-NMR project is being conducted in order to collect information from NMR facility managers and users about their NMR facilities and about their experiences using remote access so that a common protocol for remote access can be developed and adopted by facilities across the EU/UK. In this survey, we are specifically interested in GDPR (General

Data Protection Requirement) procedures implemented at NMR facilities. This will allow the R-NMR project to ensure that the common procedure that we define for remote NMR access meets General Data Protection Requirements with respect to the data that is collected and stored at the NMR facilities and how that data is shared with users.

3. Why have I been invited to take part?

You have been invited to complete this survey because you have been identified as a manager of an NMR facility.

4. Do I have to take part?

No. It is up to you to decide whether or not to take part. You can withdraw yourself from the study, without giving a reason, by advising me of this decision. The deadline by which you can withdraw any information you have contributed to the research is 31 December 2023; any data that you have provided will be deleted.

5. What will happen to me if I take part in the research?

You will be invited to complete an online survey. The survey is aimed at managers of NMR facilities and will ask questions about GDPR implementation in NMR facilities. The survey will be completed without providing your name or contact email address but you will be asked to indicate in which country your NMR facility is located.

6. What are the possible disadvantages and risks in taking part?

There are no disadvantages or risks in taking part in this research except that you will need to spend some time completing the surveys (no more than 15-30 minutes).

7. Are there any benefits in taking part?

The benefits to you and to the wider NMR community by taking part in this project will be the improvement of remote NMR access across the EU/UK that will be the outcome of the R-NMR project.

8. What information will be collected and why is the collection of this information relevant for achieving the research objectives?

We will not collect any information that will directly identify you. Information that all participants provide about GDPR procedures in their NMR facility will be included in discussions with other R-NMR participants and included in reports, but this information is completely anonymous. Your IP address will not be collected.

All survey data will be stored in Oxford on a secure desktop computer (password protected and behind a firewall) during the duration of the R-NMR project (until 30 June 2025). A version of the survey will be created for longer-term storage on University servers. We intend to keep this version of the survey for 3 years beyond publication of the project.

9. Will the research be published? Could I be identified from any publications or other research outputs?

The findings from the NMR user survey being carried out online by Oxford researchers as part of the R-NMR research project will be used in a report about the current protocols in place for remote access to NMR spectrometers. This report will be circulated to other R-NMR grant participants, will be uploaded to the R-NMR website and will be used as the starting point for other work packages in R-NMR. Individuals will not be identified in the reports. It is very unlikely that the outcomes of the surveys being carried out online by Oxford researchers will be written up for publication.

10. Data Protection

The University of Oxford is the data controller with respect to your personal data, and as such will determine how your personal data is used in the study. The University will process your personal data for the purpose of the research outlined above. Research is a task that is performed in the public interest. Further information about your rights with respect to your personal data is available at https://compliance.admin.ox.ac.uk/individual-rights. No personal data will be collected in this survey.

11. Who is funding the research?

Remote-NMR is funded by a grant from the European Union's Horizon Europe Research and Innovation Programme under Grant Agreement No. 101058595. Participation by U.K. partners, including the University of Oxford, is funded via the Horizon Europe Guarantee scheme run by Innovate UK, part of UK Research and Innovation (UKRI).

12. Who has reviewed this study?

This study has received ethics approval from a subcommittee of the University of Oxford Central University Research Ethics Committee. (Ethics reference: R77838/RE003).

The surveys have also been approved by the Steering Board of the Remote-NMR project.

13. Who do I contact if I have a concern about the research or I wish to complain?

If you have a concern about any aspect of this study, please contact Professor Christina Redfield (see contact details in next section), and she will do her best to answer your query. I will acknowledge your concern within 10 working days and give you an indication of how it will be dealt with. If you remain unhappy or wish to make a formal complaint, please contact the Chair of the Research Ethics Committee at the University of Oxford who will seek to resolve the matter as soon as possible:

The Chair, Medical Sciences Interdivisional Research Ethics Committee; Email: <u>ethics@medsci.ox.ac.uk</u>; Address: Research Services, University of Oxford, Boundary Brook House, Churchill Drive, Headington, Oxford OX3 7GB

14. Further Information and Contact Details

If you would like to discuss the research with someone beforehand (or if you have questions afterwards), please contact:

Professor Christina Redfield Department of Biochemistry, University of Oxford South Parks Road Oxford OX1 3QU, U.K. University tel: +44 1865 275330 University email: christina.redfield@bioch.ox.ac.uk



Remote-NMR: GDPR Survey

INTRODUCTION

Remote-NMR (R-NMR): Moving NMR infrastructures to remote access capabilities

- Prior to the Covid19 pandemic, the overwhelming majority of NMR data collection was carried out in-person at the NMR facility. Due to the lockdown restrictions in many countries during 2020-2021, this scenario had to change dramatically. Our experiences during Covid19 show that remote access is feasible within the field of NMR spectroscopy, and it is the aim of R-NMR to develop and exploit this type of access in full.
- The purpose of this survey is to collect information from NMR facility managers about the General Data Protection Requirement (GDPR) as it relates to NMR facilities and the provision of remote NMR access. The survey should take no more than 15-30 minutes to complete and you can select to 'Finish later' if you wish.
- Before you decide to participate in this survey, it is important for you to understand why the
 research is being done and what will be done with your responses to the survey. Please
 take time to read the information in the participant information sheet that can be accessed
 at <u>Click here</u>. Ask us if there is anything that is not clear or if you would like more
 information.

PRIVACY NOTICE AND CONSENT TO PARTICIPATE IN THE SURVEY

You are invited to complete this online survey aimed at managers of NMR facilities. We will ask questions about the General Data Protection Requirement (GDPR) as it relates to NMR facilities and the provision of remote NMR access. The survey will be completed anonymously (you will not be asked for your name or your email address) but you will be asked to indicate, if you wish, in which country your NMR facility is located. Information that you provide will be included in discussions with other R-NMR project participants and in project reports. All survey data will be stored at the University of Oxford on a secure computer (password protected and behind a firewall) during the duration of the R-NMR project (until 30 June 2025). A version of the survey will also be created for longer-term storage; we intend to keep this version for 3 years beyond the end date of the project.

Please confirm that you have read this information and that you are willing to continue with the survey. *Required*

Yes

O No

INFORMATION ABOUT YOU AND YOUR NMR FACILITY

Please confirm that you are the manager of an NMR facility or the academic responsible for an NMR facility. (Please try to ensure that the survey is only completed by one person involved in the management of your NMR facility). ***** *Required*

Yes

○ No

INFORMATION ABOUT YOU AND YOUR NMR FACILITY

In which country is your NMR facility located? Select one: * Required

 Austria 	 Belgium 	⊖ Bulgaria
 Croatia 	○ Cyprus	 Czech Republic
 Denmark 	 Estonia 	○ Finland
○ France	 Germany 	⊖ Greece
 Hungary 	 Iceland 	○ Ireland
○ Israel	⊖ Italy	⊖ Latvia
 Lithuania 	 Luxembourg 	⊖ Malta
 Netherlands 	 Norway 	 Poland
 Portugal 	 Romania 	⊖ Serbia
 Slovakia 	 Slovenia 	⊖ Spain
 Sweden 	 Switzerland 	 United Kingdom
 Ukraine 	○ Other	 I prefer not to say

If you selected Other, please specify:

The General Data Protection Regulation (GDPR) is a Regulation in EU law on data protection and privacy in the EU and the European Economic Area. Some countries have implemented the GDPR using a different name; for example, the Data Protection Act 2018 is the implementation of GDPR in the UK. GDPR applies to the processing of personal data. Personal data are any information that refers to an identified natural person. What is crucial is that the information on its own or in combination with other information can be linked to a living person. Typical personal data includes:

- a personal identity number,
- a name,
- an address,
- an email address.

The GDPR stipulates that a person can request information about their registered data and to have their personal data deleted.

Is your NMR facility located in a country where GDPR (or an implementation of GDPR) applies? * *Required*

⊖ Yes		
O No		
 Don't know 		

As a research facility providing access to NMR users, you are by definition handling personal data. We would like to understand how personal data are handled within NMR facilities.

Do you keep a register (such as LIMS/electronic notebook/Excel spreadsheet, email list etc) with personal data about your NMR facility users?

⊖ Yes		
O No		
 Don't know 		
[

Can you provide all information about the registered personal data you keep for a person if requested to do so by that person?

Yes

O No

Don't know

Can the registered personal data you keep for an individual be deleted if requested to do so by that person?

○ Yes
O No
 Don't know

Certain personal data are by their nature particularly sensitive and therefore have stronger protection in the GDPR. The types of data are called sensitive personal data. Processing of sensitive personal data is, as a rule, prohibited but there are certain exceptions. Before you process sensitive personal data you must fully understand what lawful grounds you have for the processing. Sensitive personal data are data concerning:

- ethnic origin,
- political opinions,
- · religious or philosophical beliefs,
- membership of a trade union,
- health,
- a person's sex life or sexual orientation,
- genetic data,
- biometric data that is being used to uniquely identify a person.

From an NMR perspective, this would usually mean that you analyse human biomaterial (e.g. biofluids, tissue, extracts from tissue) that can contain information on health status, drug abuse, and that can be traced to a person. A coded sample can still be traced through a pseudoanonymized coding list. Truly anonymized samples cannot be traced to a person and, as such, are not subject to the GDPR.

Do you process (this includes any kind of handling) sensitive personal data?

Yes

O No

Don't know

The GDPR imposes a number of requirements on how sensitive personal data are processed:

- Data and meta-data should be FAIR and minimal.
- The sending of meta-data should be secure (e.g. not via regular email).
- Acquired data should not be left on spectrometer hard drives for general access.
- Access to stored data should be secure (e.g. MFA: multi-factor authorization) and traceable.
- Analysis of data should be in a secure environment (e.g. using MFA, access events should be logged).
- Transfer of data should follow the same principles (e.g. using MFA, secure, logged, traceable).

If you process sensitive personal data, does your data processing comply with these GDPR requirements in the following aspects?

Does your handling of meta-data (e.g. during statistical analysis of metabolomics data) comply with these GDPR requirements?

Yes

O No

Don't know

Does your acquisition of NMR data comply with these GDPR requirements?

 Yes

O No

Don't know

Does your storage of acquired NMR data comply with these GDPR requirements?

- No
- Don't know

Does your analysis of stored NMR data comply with these GDPR requirements?

⊖ Yes
○ No
O Don't know

Does your transfer of stored NMR data (including meta-data, analysis results, etc) comply with these GDPR requirements?

○ Yes		
○ No		
 Don't know 		

Are you active in the role of personal data controller in your NMR facility?

YesNo

Don't know

If you are not the personal data controller in your facility, do you know who the responsible person is?

YesNo

Are you aware of the legal requirements as personal data controller?

YesNo

Are you active in the role of personal data processor in your NMR facility?

0	Yes
\odot	No

Don't know

If you are not the personal data processor in your facility, do you know who the responsible person is?

 Yes 			
O No			

Are you aware of the legal requirements as personal data processor?

0	Yes	
0	No	

Is your NMR facility using the Bruker IVDr concept?

0	Yes

No

Don't know

Have you signed an agreement in which Bruker is defined as personal data subprocessor?

⊖ Yes		
O No		
 Don't know 		

Do you process your data on one or more servers located outside of the European Union?

○ Yes	
○ No	
 Don't know 	

Do you routinely delete sensitive personal data after a fixed time period?

0	Yes
0	No
0	Don't know

Do you have permission to keep data for an extended period of time (e.g. for model building or database purposes)?

○ Yes		
⊖ No		
 Don't know 		

FINAL QUESTION - The General Data Protection Regulation (GDPR)

Thanks for filling in the questions relating to the GDPR. If you have further information that you would like to provide about how the GDPR operates in your NMR facility, please enter this in the text box below. (If you indicated that GDPR does not apply in your country then leave the text box below blank and click 'Finish').

FINAL COMMENTS AND THANKS!

Thank you very much for taking the time to complete this survey. Your responses will be important in formulating common practices for future provision of remote access to NMR spectrometers.

If you would like further information about the R-NMR project then please visit the project webpage at https://www.r-nmr.eu or follow the project on Twitter @RemoteNMR_eu.

A summary of the results of the earlier Facility Manager and NMR User surveys is available on the R-NMR web site under the 'OUTCOME' tab.

A summary of the results of this GDPR survey will be available in early July on the R-NMR web site under the 'OUTCOME' tab.



APPENDIX 2

Remote-NMR (R-NMR): Moving NMR infrastructures to remote access capabilities

GDPR SURVEY (19-26 June 2023)

Univ. of Oxford Central University Research Ethics Committee Approval Reference: [R77838/RE003]

SUMMARY OF RESPONSES TO QUESTIONS 1-8 AND 19 FROM 79 SURVEY PARTICIPANTS



Showing 79 of 79 responses Showing **all** responses

Hiding **11** questions Response rate: 39%

Please confirm that you have read this information and that you are willing to continue with the survey.



Please confirm that you are the manager of an NMR facility or the academic responsible for an NMR facility. (Please try to ensure that the survey is only completed by one person involved in the management of your NMR facility).

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	0	

-	_	-

In which country is your NMR facility located? Select one:



3.a If you selected Other, please specify:

No responses

Is your NMR facility located in a country where GDPR (or an implementation of GDPR) applies? 75 (94.9%) Yes No 0 Don't know 4 (5.1%) 5 Do you keep a register (such as LIMS/electronic notebook/Excel spreadsheet, email list etc) with personal data about your NMR facility users? **52** (66.7%) Yes 24 (30.8%) No Don't know 2 (2.6%) 6 Can you provide all information about the registered personal data you keep for a person if requested to do so by that person? Yes 53 (67.1%) 16 (20.3%) No 10 (12.7%) Don't know Can the registered personal data you keep for an individual be deleted if requested to do so by 7 that person? **56** (70.9%) Yes 7 (8.9%) No Don't know 16 (20.3%) 3/4





Showing 79 of 79 responses Showing **all** responses Hiding **18** questions Response rate: 39%

19 Thanks for filling in the questions relating to the GDPR. If you have further information that you would like to provide about how the GDPR operates in your NMR facility, please enter this in the text box below. (If you indicated that GDPR does not apply in your country then leave the text box below blank and click 'Finish').

-1

Showing all 18 responses	
Most users of our NMR facility have to be registered with our department IT team so there would be a record of users held in the department as well as in the NMR facility. I believe that our IT personal follow GDPR.	1060991-1060973-112168566
Our machines are only used within our research group an I know all users personally.Therefore, we don't have a special NMR user list with personal data.We have an online booking system but people manage their data that's in there themselves.	1060991-1060973-112174286
We are in principle in a country where GDPR applies. But no one is in charge of implementing this at the University, so the institution has never required our NMR facility to take care of this.	1060991-1060973-112177080
In my opinion, our NMR facility meets requirements of GDPR.	1060991-1060973-112191516
Users of the NMR is only using work e-mail when submitting samples for NMR.	1060991-1060973-112197758
We require the name, email and phone number to verify the person is authorized to use the facility. If the user asked to delete these items of personal data, we would comply but he/she would no longer be able to use the facility services.	1060991-1060973-112188806
Users' personal data (names, e-mail addresses) fall within the scope of the GDPR and is therefore treated accordingly, i.e. users' personal data, to which only the facility staff have access, is stored on the web server and is not used for any other purpose than to identify their samples and NMR spectra. Furthermore, users' personal data is not shared with other users and is treated confidentially.	1060991-1060973-112204260
A final remark to the questionary and GDPR. One of our customers in the facility is a hospital research department. For them, I regularly measure samples which are handed to me with a code. The code can not be traced by me and for me, there is not information about the patient, treatment, gender, placebo etc etc. Data is stored as DATE CODE.	1060991-1060973-112237590

we may measure NMR spectra for customers/collaborators which are of human origin (urine, blood) but we do not want to know anything about those samples. They are in that sense anonymous and we cannot trace anything from them. We expect that any GDPR 'issues' must reside with the people who collect the samples and store data about their origin. We are interested to know how NMR facilities can provide such services with minimal adminstrative burden. We expect also that ethical approval rest with the user.	1060991-1060973-112365130
No	1060991-1060973-112367617
We do very little human tissue work, and are only involved in data acquisition. All data analysis is carried out outside the facility.	1060991-1060973-112368552
As a contract lab, customer data is handled using LIMS system. Deletion of any data would be subject to change control and advice from our quality assurance team. Our users (analysts) personal data is handled by HR team, but also features in LIMS system as unique analyst identifiers.	1060991-1060973-112371245
The local university hospital (separate legal entity) in control of the biobank and the university (separate legal entity) hosting the NMR facility do not agree on how to interpret the GDPR.	1060991-1060973-112392466
To clarify the answers given in the previous section regarding personal sensitive data:	1060991-1060973-112381341
where the response is 'yes', we believe we are GDPR compliant. Where 'don't know' is given, this refers to the fact that facility staff do not handle the processing/analysis of sensitive data themselves.	
Users who measure samples involving sensitive (meta-) data are responsible themselves (and/or with their collaborators e.g. clinicians) for the analysis and processing of NMR data beyond acquisition of the data on the spectrometers. This activity is performed outside the facility firewall.	
The facility ensures that any (temporary) data storage provided by the NMR facility is GDPR compliant, e.g. providing users with individual spectrometer and data server accounts (no shared accounts permitted) with users able to specify the extent of restricted access, as required, to their data. The responsibility lies with the user to be GDPR- compliant, including the removal of sensitive data from the server. Users are requested not to store data on the spectrometer (we provide a dedicated data server), but this is not actively/regularly policed by NMR staff.	
Data transfer by users to/from the facility employs ssh protocol, with no MFA. In our case, transfer activity might not be considered to be fully traceable.	
While data are being acquired during a booking slot, unless screen locks are religiously employed (which is not necessarily desirable as it	

could hamper urgent facility manager access should it be required) the possibility exists that sensitive data could be displayed/read/copied directly via the unlocked spectrometer PC screen locally (users often use the 'title' text for logging pseudo-anonymised sample codes).	
We only keep personal data of the actual users of the facility to contact them if necessary. We do not keep any information about patients whose samples are measured.	1060991-1060973-112537813
No question at this point.	1060991-1060973-112540959
It is important to bear in mind that the NMR Facility of CCiTUB belongs to the University of Barcelona, which ultimately has the competences in terms of GDPR.	1060991-1060973-112533319
The biological fluids in our facility (that by their nature contain sensitive personal information) are handled through an anonymous code system. The personal data (name, sex, and nationality) that correspond to each sample are kept by the collaborating clinical doctors. Our facility keeps the persona data of the NMR users (internal, external from academia or private sector).	1060991-1060973-112551833



APPENDIX 3

Remote-NMR (R-NMR): Moving NMR infrastructures to remote access capabilities

GDPR SURVEY (19-26 June 2023)

Univ. of Oxford Central University Research Ethics Committee Approval Reference: [R77838/RE003]

SUMMARY OF RESPONSES TO QUESTIONS 8-18 FROM 7 SURVEY PARTICIPANTS WHOSE FACILITIES HANDLE SENSITIVE PERSONAL DATA



11 Does your storage of acquired NMR data comply with these GDPR requirements?



12 Does your analysis of stored NMR data comply with these GDPR requirements?



13 Does your transfer of stored NMR data (including meta-data, analysis results, etc) comply with these GDPR requirements?



14 Are you active in the role of personal data controller in your NMR facility?



14.a If you are not the personal data controller in your facility, do you know who the responsible person is?



14.b Are you aware of the legal requirements as personal data controller?



15 Are you active in the role of personal data processor in your NMR facility?



15.a If you are not the personal data processor in your facility, do you know who the responsible person is?



15.b Are you aware of the legal requirements as personal data processor?



16 Is your NMR facility using the Bruker IVDr concept?



16.a Have you signed an agreement in which Bruker is defined as personal data sub-processor?



17 Do you process your data on one or more servers located outside of the European Union?



18 Do you routinely delete sensitive personal data after a fixed time period?



18.a Do you have permission to keep data for an extended period of time (e.g. for model building or database purposes)?





APPENDIX 4

Remote-NMR (R-NMR): Moving NMR infrastructures to remote access capabilities

INTERNAL SAMPLE SHIPMENT SURVEY

SUMMARY OF RESPONSES TO INTERNAL R-NMR PARTICIPANT SURVEY OF SAMPLE SHIPMENT PRACTICES

	Please add yo	ur comments to	the releva	ant sections	below making	sure you put your r	ame or participa	nt short nan	ne (i.e. BMRZ, UOXF e	tc)														
Types of samples handled. Please indicate in the Sample type	table which types	of samples your fa	cility accept	s.						Participant														
Biological	CIRMMP	UWAR	CRMN	SRU	UU	BMRZ	UNTE	UNIWARSAW	NIC	CICBIO	DEBNMR	LIOS	HWB-NMR	RBI	UGOT	UPAT	MU	UB	UOXF	UIB	NOVA	JKU	AU	UNI Graz
Inflected substances	Yes, but only infectious agents that may be handled under Biosafety Level 2 or lower	Yes, with an appropriate risk assessment (has not occurred) University Health and Safety review	Yes, with an appropriate risk assessment	No*	No	no	No	no	No	Yes, but only infectious agents that may be handled under Biosafety Level 2 or lower	No	No	No	No	no	Yes, but only infe	cia No	No	no	no	no	no	no	no
Diagnostic samples	Yes (see infected substance)	with risk Assessment	with risk Assessment	No*	with risk assessment	yes with risk assessemen	t with risk Assessment	with risk Assesr	with risk Assesment	Yes, but merely as an aid to diagnosis. We do not make clinical diagnoses	No	No	with risk assessment	No	Yes, with risk assessmen	Yes (see infected	with risk su Assessment	with risk assesme	no		no	yes, with risk assessment	no	10
Biological products (e.g., purified proteins, nucleic acids)	Yes	Yes with Risk	Yes with risk	No*	yes	yes	yes	yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	yes	yes	yes	yes	yes	y #3
Chemical	Tes Bolz	Assessment	Assessment	NO	only if Bac I	00	WEITIGK Passassmens	no	No	NO	No	No	No	NO	yes, with risk assessment	Yes with risk ass	ess No	No	no	no	no	no	00	10
Non-hazardous	Yes	Yes	Yes	Yes	yes	yes	yes	yes	Yes	Yes	Yes	Yes	Yes	Yes	yes, with risk assessment	Yes	Yes	Yes	yes	yes	yes	yes	yes	yes
	with Risk Assessment	with Risk Assessment	with risk Assessment	Yes	with risk assessment		with risk assessment			No				No			with risk Assessment		risk assessment and depending on risk we might					
Hazardous	No	with Risk	No	No	ne	00		with risk Assesr	No	No	Yes with risk as	With risk asse	swith risk assessment	No	yes, with risk assessment	Yes with risk ass	No	with risk assesme	say no.	with risk assesment	yes with risk assesment	yes, with risk assessment	yes, with risk assessme	int yes with risk at
Radioactive		Assessment				00	no	no	No		No	No	No		no	No		No	None so far. We would probab	no	00	no	10	60
Open questions																								
Do you have documented written procedures for the users to prepare their samples for shipment? If yes, please link them in the table the table of the same table to the same table to the same of the same table to the same table tabl	Biospecimena shipping procedured are requitated by WHO and at European level by ADR (The European Agreement concerning the International Carriage of Dangerous Goods by Roadi	No -User Provides instructions	No. Direct discussion between the user and the platform managers.	No -User Provides instructions	no, user provides	00	no, user provides	no, user provides	No, user provides	Not earofly since the process varies depending on the shipping doctination	No	No	No written sample shipment prep procedure. Users concut with facility staff for advice, if sequind.	No written procedure. Users could consult facility staff if a specific sample preparation is needed.	no, users provide	No written sample	e st No. We expect	No, user provides	no	no	No written procedure. Users must consult facility staff if a specific sample preparation is needed.	no	00	80
bo you lak care in or an the marking marketorian	165	140	Tes	Tes .	yes	yes	yes, rok assessmen	Yes	165	y ca Ves. for biological fluids (prine: plasma or severn) we need	Tes	145	Samples must be ethically approved by the	162	yes	Tes	165	163	yis.	745	yes	yus	765	yes
Do you have specifics for rejecting samples before measurements?	Yes	No, the risk assessment and university provide oversight if the hazard is inappropriate	No	No Yes	we check sample against expectations upon arrival (color, aggregation state etc)	no	no, user provides	no, user provide	No	1 co, no resource a anna (unite, panata es serim) we teed a minimum amount of sample, collected according to SOM and attend at 40°C. They must also have a acrise of associated metadata. If the cold claim is besten, we do not have metadata or there is not enough volume, the samples are not valid for amlysis.	No	No	user's healtuision (if applicable) prior to interaction with the NMR facility, and risk assessments and MSDS/COSHH sheets provided must be automotived according to University of the mitightem health and safety regulations. Non-compliance would result in rejected samples.	No	yes	Yes	No. If we susp	eNo, user provides	no but if an initial 1D or 2D HSQC looked wrong I would contact the person no experience of facility staff but some users do have	10	No	no	No, that is based on the assessment of the partie sample	Yes, if the sample tubes are not of proper length risk or if they are cutar contaminated on the outside.
sensitive samples?	Yes	Yes	Yes	-Light sensitive	yes					No				Yes					experience of making their own samples and running					
"No (not done yet						yes	yes	yes	Yes		No	No	No		yes	Yes	Yes	Yes	them	yes	yes	yes	no	yes
If you do not have a documented written procedures for the user	to prepare their samples	for shipment, do you h	ave a praxis? If y	es, please describ	a it in the "Praxis" sprea	adaheet		1																
Sample preparation procedures																								
	CIRMMP	UWAR	CRMN	SRU	Participant	BMRZ	UNTE	UNIWARSAW	NIC	CICBIO	DEBNMR	LIOS	HWB-NMR	RBI		UPAT	MU	UB	UOXF	UIB		јки	AU	
Solution-state NMR - Are samples shipped inlas (check a	I that apply)										_													
NMR tube	Yes	N/A	Yes	No	yes (although not preferred)	yes	yes	yes	Yes	No	Yes	No	Yes	Yes, but rarely	yes	No	Yes	Yes but not prefer	An industrial data series samples in tubes in SampleJet racks using a courier which is really like a taxi service (i.e. pickup from them with direct delivery to us)	yes	no	yes	yes	yes
Frozen or cooled solutions in Cryovials (or other small tubes)	Yes	N/A	Yes	No	yes					Yea				No					Once or twice samples have been shipped as solutions in Eppendon't tubes and we have transferred to NMR tubes in the facility. Most of our users are prefer to travel the 1-2 hours by train from London/Bristo/Southampton and deliver the samples in					
Solids or liquids to be dissolved/diluted in buffer at the facility?	Yes	N/A	Yes	Yes	yes	yes	yes	yes.	Yes	Yes	Vor	Yee	Yes	Yes	yes	Vec	Vec	Yes but not present	person.	yes	yes	ves	340	yes
Other (please describe)						yes	ywa	Yes	165		Tes .	Tes	res		yes	res	165	Tes	10	743	yes	yes	765	yes
Solid-state NMR - Are samples shipped inlas (check all th	at apply)									-														
Pauskar rotors Powders	Yes	Yes	Yes	Yes	yes	yes (also suspensions of proteolgosoms or large complexes which are subjected to ultracentrifugation here, before packing into a MAS NMR rotor, for DNP a	not appecate	no	No	Yes	not applicable	103	currently NA	NA		not appecable	Yes	ooes not appry	NA	NA	NA	10	yes	NA
						glassy matrix would be added)	not applicable	yes	Yes		not applicable	Yes	currently N/A			not applicable		does not apply	NIA	NIA	NA	yes	yes	NA
Other (please describe)	concentrated solutions	class, precipitalis, tissues (fly heads, mouse tails, plant stems, mammalian colagen) membrane extrusions, thin films, batteries, single crystals, concentrated	Precipitates, crystals, solutions, sediments	Thin films, crystals, gelatines, polymers, concentrated solutions, precipitates, nanoparticles, batteries	gels, solution, crystals etc	Highly concentrated liquid samples in water/glycerol which are then used as frozen solutions in DNP- MAS experiments (usually we then add the polarizing agent before packing into the DNP rotor)	not applicable		gels, tissues, batteries	Precipitates, tissues, mouse livers human sperm, concentrated solutions, sedimented material.	not applicable	Solutions, sediments, gets	ourrently NA	N/A		not applicable	10	does not apply			NIA	any solid-state material	N/A	NA
pampre smpthent		1	l.	- I	Participant	l	1	I																
Indicative number of national/European/extra-European	CIRMMP	UWAR 40.50	CRMN	40.50	-20	BMRZ	UNTE		NIC 500 samples (number per	CICBIO	DEBNMR		HWB-NMR	RBI < 5		UPAT	MU	UB	-20 per year shipped by					
shipments incoming per year	25	40-50	20	40-30	-30	10-20	-1000 (all national, 95	20	shipment varies)	~80	-10		< 10	C 5		~20-30	25	10	industrial user I don't know. The industrial	5	10-20	5	\$	10
Which was the most reliable courier in your experience?	DHL	DHL	DHL	DHL	cannot tell difference	cannot tell difference	cannot tell difference	cannot tell difference	No difference	World Courser, but right now we cannot use it and then we employ a combination of Mail-boxes (in Spain) with FEDEX for another countries	cooper tel diffe	DHI		UPS		DHI	cannot tail diffe	concert toll difference	user uses a local company which delivers door-to-door	DHI	constant fail differences	can not tell	con not tell	con not tell
Do users carry the sample themselves (if yes, which %)?	50% of users visitin the facility in presence	g Yes, appx 60%	Yes, -50%	Yes, appx 80%	-75% of physical visitors	yes, approx 80%	95%	50		No, just 5% of the users	- 80 %	509	95%	95 %		Yes approx 70%	Yes approx 60	195 % of physical v	Most users prefer to deliver the sample themselves. They are then involved in some initial setup of experiments and use remote access to check on data after a day or so and possible to setup further experiments.	90%	no			95% 90%
Recurring bottlenecks and corresponding workarounds, I any (e.g., custom delays; shipment from a specific country/region; wrong labels)	If samples come from extra EU countries (can be stopped at the Customs). Solid CO2 refill is required for shipment that can take more than two dows	Customs costs a day from outside the UK. Only work around has been checked baggage.	No specific recurring bottleneck	Samples can be lost	samples can be delayed, also due tr internal university logististics	custom delays, sample	No specific recurring bottleneck			Custom delays, samples can be lost because solid CO2 refill should be required but sometimes the shipment companies say they cannot do it.		Samples on dry ice sometimes travel an unnecessary long way and arrive with	Correct documentation and packaging is critical to avoid customs delays into the UK. Final lag delayer from local delayticution centre can be problematic - lost or delayed delivery or delayer to woring address. National users don't take the risk with courtiers and prefer to delayer the sample(s)	No specific recurring bottleneck					All our users are from within the UK-I would imagine there would be severe delays shipping samples		Samples from countries outside EU sometimes are delayed due to customs			none encountered

Do you have standard procedures to return the samples to the users?	No	No	No	No	no	00	no - user dependent	no No	No	No	No	No	No	No	No. Generally	No but user depe	No standard procedure. Somethings they travel to Oxford to collect the samples. Sometimes they don't want the samples to London and meet the user at the train meet the user at the train station. No	No	10	No	10
Do you charge some costs directly to the users (e.g. shipment; sample disposal)	It can be	No	No	No	no	no	ne	ne No	It can be	No	No	No	No	It can be	No.	No	shipping costs. We don't have funding to pay for this. No	It can be	ne	No	10
What regulations exist relating to shipping samples within your countly or between count les? (please provide link)	WHO and ADR	Unknown to us.	WHO and ADR	Chemical transport, safe transport	unknown to us	unknown to us	utilonown to us	unknown to us Unknown	When ending biological supple from Spirit to use EU contrainte, des required decumentation in shown in the following indi- larity of the second state of the second state of the products the regulations to be followed in Spirit neu- train 4 min this is hardware and statements by primitics/spirital-spiritics/yproducts- quintics/spirital-spiritics/yproducts- quintics/spirital-spiritics/yproducts-	wB Only a statem	Unknown	The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations, divide from EU directives aDR Regulations, divident from EU directives and the the State Transport of Dangerous Goods by AP published by the International CMA Aviation Organization (C2O). The International Martine OCCO), The International Martine International Martime Organization (MID) VHOD	Unknown to s	s WHO, ADR, ID	Unknown to u	Unknow to us	I don't know. For international shipping three would be customing any shipping three three the Bio as a for the three three to be Bio as a for the three customic doctoring any shape customic Unknown	Regarding the transport of chemical products, the regulations to be followed in this link: https://www.inte. publicloss/IMTTiPortguess/T ransportas/Redoviarios/Transportas/Redoviarios/Trans portas/Redoviarios/Transport	do not know	Unknown	unkrown
An three efficient legal accels implications (ELS) associated with the anapping of samples bittern your deality? (sease provids link if available)	Yes, the official approval is needed for human and animal samples. It must state that third parties can receive and store the samples.	We have not handled samples which could originate from an identifiable individual. We assume the ethi concerns have been approved been approved been approved prior to our interactions (preliminary dat) demonstrated)	No	No	no	na	80	na No	Yes, the efficient approval is needed for burnum and assimal samples. If the project is a coldensation we safe for the infection approved, and are cold also using an Material Transfer Agreement with the overser of the samples. If we is early along a service, we presente the overser of the samples has all the necessary paperwork.	We do not deal	No	If applicable (human/animai-derived annpais), efficiel approval from the user's user prior to sitement.	No	No	We generally	No	So far, we have not handled maturbackers as amplies so 1	no	not sure	No	10
Please describe any other aspects relevant to sample shipping	All samples arriving to CERM/CRIMMP infrastructure need to be accompanied by a declaration of dangerourness from dangerourness from dangerourness (field). Short quidelines for remote NMR acces are available tossers (ink) and the include some information on sample shipment	An MSDS is expected 1 weel advance, and packed with the communication usually confirms danger/taxicity or samples and to determine what appropriate equipment to pa the sample is. T is user provided	t in f ha isk is	MSDS if available, although new compounds do not have MSDS, so they are treated as potential active drug (pharmaceutic als) or as toxic compounds (heavy metals)	needs interaction wi user to define expectations and procedures				In the same of Adventisty, interaction with the new in measure yet define expectations and procedures. In how of perturbal harsels or maximy, few biological flucks is in also accessary the interaction with the errors of the sampl	ō.				needs interact	needs Interaction w/ user to define expectations and procedures	verbal or written	Triade currently (the to the Degree to Description of MPR: UCXPF description of MPR: UCXPF description of MPR: UCXPF description of the the scotts may be matching for scotts of up matching for scotts of up the sample to the right the sample to the right and the scotts of the right scotts in the right amount of	Chanicula requite Interaction with the user in order to dotomical procedures, as well as to be reformed about potential marands or toxicitiv.	sender needs to indicate potential danger and special handling	We perform a risk assessment according to Danish regulations before the samelie skibood	A contact point which is easy to reach by telephone provided.