

# CycleSync UCD

## Privacy Policy

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### Table of Contents

Table of Contents.....	1
1. About This Privacy Policy .....	2
2. Who We Are.....	2
3. The purpose or reason for collecting your data .....	2
4. What Data We Collect .....	2
1. Questionnaire Data .....	3
2. Wearable Device Data (Optional) .....	3
5. How We Use Your Data .....	3
Legal Basis for Processing .....	4
6. Data Anonymisation, Protection and confidentiality.....	5
7. Your Rights .....	5
8. Contact Us .....	6

## 1. About This Privacy Policy

This Privacy Policy follows the General Data Protection Regulation (GDPR), which was introduced in May 2018. For further information on GDPR, you can view resources by the [EU](#), [Wikipedia](#), or the [ICO](#) (other sources are also available).

This Privacy Policy explains how University College Dublin (UCD) collects, processes, stores, and protects the data you provide when participating in this research study. The research examines the relationship between heart rate variability (HRV) and menstrual cycles, utilizing anonymised data from wearable devices.

We are committed to respecting and protecting your privacy. All data provided via this platform is anonymised, ensuring that it cannot be linked back to you personally. We do not collect any personal identifiers, such as your name, email address, or device credentials.

This Privacy Policy applies only to this research platform and aims to provide you with a clear understanding of what data we collect, the purpose for its collection, how we protect it, and how we comply with data protection laws.

## 2. Who We Are

University College Dublin (UCD) acts as the data controller for all information submitted through this platform. This privacy policy and our practices adhere to applicable data protection laws, including the General Data Protection Regulation (GDPR).

## 3. The purpose or reason for collecting your data

The purpose of collecting your data is to support research investigating how heart rate variability (HRV) and other physiological measures vary in relation to ovarian hormone profiles (e.g. menstrual cycle phases, hormonal contraceptive use, and reproductive life stages) in females. Data collected through this study will be analysed in aggregated form and used solely for research purposes. No directly identifiable personal information is collected or used as part of this study.

## 4. What Data We Collect

We do not collect any personal identifiable data for this research study. As part of this study, we collect a limited set of effectively anonymised data to support research on heart rate variability (HRV) and hormonal profiles in females. This means we do not collect more data than we need. Information collected includes:

## 1. Questionnaire Data

You may be asked to provide general information, including:

- Age range
- Physical activity level
- Skin type
- Hormonal contraceptive use,

This information is collected in a non-identifiable format and does not include any personal details such as your name, IP address, or contact information.

## 2. Wearable Device Data (Optional)

If you choose to donate data, you may share selected data from your wearable device or health app, such as:

- Heart rate variability (HRV) data: HRV measures the variation in time between heartbeats, often used as an indicator of recovery, stress, and overall physiological status.
- Temperature data (if available): Skin temperature measurements and / or changes recorded by your device, which may reflect physiological changes (e.g. across the menstrual cycle).
- Menstrual cycle tracking data: Information you have logged about your cycle, such as cycle dates, symptoms, ovulation indicators, and/or reproductive status.

You can choose which data to share and the time period for which data are shared.

### What We Do Not Collect

1. **Personal Identifiable Information:** We do not collect personal identifiers like your name, email address, or any other data that could be used to identify you.
2. **Account Credentials:** We do not collect or store any login information or credentials associated with your wearable device or third-party services.
3. **Voluntary Participation:** Participation is entirely voluntary, and you control the data you provide. Once your data is submitted and anonymised, it cannot be deleted or traced back to you.

## 5. How We Use Your Data

## How We Use Your Data

Once you connect your wearable device to this platform and provide consent, your data is securely processed and stored in an anonymised format.

Your data will be used in the following ways:

1. **Research Purposes:** Your data will be used solely for scientific research purposes to better understand how physiological measures, such as heart rate variability (HRV), relate to ovarian hormone profiles in females. Specifically, your data will be used to:
  - a. Analyse patterns in HRV and related measures across menstrual cycle phases, hormonal contraceptive use, and reproductive life stages
  - b. Investigate relationships between physiological signals (e.g. HRV, temperature) and hormonal changes
  - c. Improve understanding of female physiology in sport, exercise, and health contexts
  - d. Inform future research, tools, and guidelines related to wearable technology and female health monitoring
2. **Data Analysis:** Your data will be analysed in combination with data from other participants and reported in aggregated form. Results may be shared through academic publications or presentations, but your identity will never be revealed. Individual participants will not be identified in any outputs.
3. **Anonymisation:** All collected data will be anonymised at the point of donation.

All data processing is conducted in line with UCD data protection policies and applicable data protection legislation.

## Legal Basis for Processing

The legal basis for processing your data is your **explicit consent**, which you give when you voluntarily choose to participate in the study.

This study is designed to collect anonymous data. No information that directly identifies you (such as your name, email address, or contact details) is collected. As your data is anonymised at the point of collection, it is no longer considered personal data under GDPR. As such, certain data protection rights (such as access, correction, or erasure) may no longer apply to the research dataset. You may withdraw your consent at any point before you submit your data. After submission, it will not be possible for the research team to identify your data to remove it. This is because it is anonymised at the point of collection and cannot be linked back to you.

## 6. Data Anonymisation, Protection and confidentiality

We take the protection of your data seriously. The study is designed to minimise the collection of personal data. Data collected for research purposes will be stored securely on password-protected and access-controlled systems. Only authorised members of the research team will have access to the data. The research team cannot identify participants from the research dataset.

The following measures are in place to safeguard your data:

1. **Data Minimisation:** Only the data necessary for the research purposes described are collected and processed.
2. **Secure data transfer:** All data is transferred using secure, encrypted transmission protocols.
3. **Access Control:** Access to the data is restricted to authorised researchers and is controlled and monitored.
4. **Regular Reviews:** We conduct regular reviews to ensure compliance with data protection laws and best practices.
5. **Anonymisation:** When you choose to donate data, you will securely connect your wearable account using a standard authorisation process. This connection occurs directly between you and your device provider, and the research team does not collect or store login details at any time. During data transfer, a device-related identifier may be used to enable secure data transfer. This identifier is immediately converted into a secure coded value, and the original identifier is not stored. This coded value cannot be used to recover the original identifier or to identify you. The coded value is used to group data from the same device account within the study. No directly identifiable personal information is collected or stored, and the research team cannot identify individual participants from the dataset.
6. **Data Security:** Appropriate technical and organisational measures are in place to protect your data against unauthorised access, alteration, disclosure, or loss. Regular reviews and monitoring are conducted to ensure ongoing compliance with data protection legislation and best practices.
7. **Data Retention:** Data is retained only for as long as needed to support the research, after which it is securely archived in accordance with research protocols.

## 7. Your Rights

The data collected in this study is anonymised at the point of collection and is not linked to any personal information. Once anonymised, the data cannot longer be associated with an identifiable individual and is therefore no longer considered personal data under the General Data Protection Regulation (GDPR).

As a result, individual data subject rights (such as access, rectification, or erasure) do not apply to the anonymised data.

You may withdraw from participation at any time prior to submitting your data. After submission, it is not possible to withdraw your data, as it is anonymised immediately and cannot be linked back to you.

## 8. Contact Us

The project is being run by researchers from UCD School Public Health, Physiotherapy and Sports Science, Insight Research Ireland Centre for Data Analytics, the Institute for Sport and Health and the School of Computer Science. If you have any questions, concerns, or requests related to this Privacy Policy or the research study, please contact:

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