

**Layered Privacy Notice**  
**Library Membership: University Staff and Students**

**Activity/Processing being undertaken: Library Management System,  
Membership criteria, borrowing and other access and related communications**

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Edinburgh Napier University is providing you with this information in order for us to comply with the General Data Protection Regulation (EU) 2016/679, which requires us to tell you what we do with your personal information.

**Who is collecting the information?**

Edinburgh Napier University as the “Data Controller”.

**Who are we sharing your Personal Data with (externally)?**

Please note that the University uses a 3<sup>rd</sup> party (ExLibris) as a “Data Processor” to manage your library membership. You can find more information on ExLibris via the link below:

<http://www.exlibrisgroup.com/>

The University undertakes to maintain your information securely and will restrict access to employees, our professional advisers, authorised agents and contractors on a strictly need to know basis. We will only disclose your data to external third parties (other than any specified above) where we:

- Have your consent
- Are required to do so under a statutory or legal obligation, or
- Are permitted to do so by Data Protection legislation.

**Why are we collecting it/what we are doing with it (purposes)?**

Personal information, names, contact details and University account details are collected in order to enable access to and borrowing of, items from the libraries, and communications relating to these activities

**What is the legal basis for processing?**

**For students:** As part of the University’s stated objects of providing education, research and in terms of Article 6(1)(b) of the General Data Protection Regulation.

**For staff:** As per Article 6(1)(b) as we require to process your personal information in order to provide you with library services and manage our services to you as part of a contract.

**How are we collecting this information?**

Your information is collected from the University’s student and staff databases.

## **What information are we collecting (whose information and what type of personal data)?**

- Edinburgh Napier staff and students and Associate staff
- Name, matric or staff numbers, contact details, module and course details

## **Who can see your information within the University?**

Information Services staff

## **How long is your information kept?**

Any financial records will be held for 6 years after you leave the University. All other personal information will be held for one year after you leave the University.

Further information can be found online at:

<https://staff.napier.ac.uk/services/governance-compliance/governance/records/Pages/RecordsRetentionSchedules.aspx>

## **How secure is your information?**

Your information is stored securely by our 3<sup>rd</sup> party provider Ex Libris in their European Data Centre. You can find more information via the links below:

Ex Libris Cloud Services - <http://www.exlibrisgroup.com/services/cloud-services/>

Ex Libris Privacy Policy - <http://www.exlibrisgroup.com/privacy-policy/>

## **Who keeps your information updated?**

Data is updated from central University staff and student systems

## **Will your information be used for any automated decision making or profiling?**

No

## **Is information transferred to a third country? Outside the EEA and not included in the adequate countries list.**

No

## **Surveys**

We occasionally run a survey to improve our services and as benchmark for the Customer Service Excellence network. Our lawful basis for this processing is also Article 6(1)(b) of the UK GDPR, as above.

In this survey we ask for written feedback, and invite participants to optionally provide their email address. Responses can be provided electronically, using a University-approved system, or on paper.

We ask that participants refrain from providing any personal data in comments. Please be assured that email addresses provided will be deleted after 1 month if not used to follow up with participants. We will also anonymise any personal data provided in comments.

Raw data is not shared externally, although we share high-level anonymised summaries of survey outcomes with other universities within the Customer Service Excellence network. Any paper survey responses are kept in a secure location, prior to scanning to convert to digital responses (after which, the paper versions will be shredded).

If you change your mind, and wish to withdraw a response, after submitting the survey you can contact us at [library@napier.ac.uk](mailto:library@napier.ac.uk). Please note, though, that this will not be possible after the point where we anonymise responses (e.g. by deleting email information, or any personal data in comments) which will take place around 1 month after submission.

### **Is any other information available?**

You can access all the University's privacy notices using the following link:

<https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx>

You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL:

<https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx>