**Data Protection: Layered Privacy Notice**

**Keep On Track Service**

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 is the “Data Controller”.

**Who are we sharing your Personal Data with?**

Access to your information will be restricted to Keep On Track Service staff. It will only be shared with other University professional services, staff and external support agencies, where required, to provide the service you have requested.

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

1. Provision of student retention services
2. To manage student wellbeing, concern and risk
3. Administrative and statistical purposes
4. For the university to better understand the reasons why someone may want to leave and to inform the development of support services for students.
5. Individual data will not be identifiable when used for these purposes.

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.
* Have serious cause for concern for your safety.
* Are required to do so under a statutory or legal obligation, or
* Are permitted to do so by Data Protection legislation

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

Services are provided by the University’s Keep on Track service on the request of individuals (data subjects).

The legal bases for processing are:

1. Art 6.1.(c) – for compliance with a legal obligation, namely the Equality Act 2010
2. Art 6.1. (e) – for the performance of the University’s public task, namely the provision of education, ensuring adjustments are made where appropriate to facilitate the provision of education.

**How are we collecting this information?**

All information will be collected directly from you during appointments or from information held on the University’s record systems.

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

Who - Edinburgh Napier Students accessing Student Keep On Track service

What - Name, contact details, matriculation number, course information, reason(s) for accessing service

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

Keep On Track Staff and Management. The Keep On Track service has a strict codes of confidentiality and will only pass on information to others with your consent in order to coordinate support services for you and also in exceptional circumstances that includes significant risk to self or others (please see the Keep On Track Confidentiality statement).

**How long is your information kept?**

Six years after completion of studies.

Further information can be found [here](https://staff.napier.ac.uk/services/governancecompliance/governance/records/Pages/RecordsRetentionSchedules.aspx).

**How secure is your information?**

For services provided locally by Information Services, information is stored on servers located in secure University datacentres. These datacentres are resilient and feature access controls, environmental monitoring, backup power supplies and redundant hardware. Information on these servers is backed up regularly. The University has various data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy or your personal data. The University makes use of a number of third party, including “cloud”, services for information storage and processing. Through procurement and contract management procedures the University ensures that these services have appropriate organisational and technical measures to comply with data protection legislation. The University is [Cyber Essentials Plus](https://www.cyberessentials.ncsc.gov.uk/) accredited.

**Who keeps your information updated?**

* Keep On Track staff
* Students using the services are responsible for advising staff of changes to their personal data and/or circumstances to ensure their record is accurate.

**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

**Is any other information available?**

You can access all the University’s privacy notices [here](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 [here](https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx).