Privacy Notice – Admissions

Activity/Processing being undertaken

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”.

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

We are collecting data so that your application to study with us may be considered.

The information you provide will be used to:

- View your application and consider and respond to if you are successful
- Contact you for further information if your application is incomplete or documentation is required
- To keep you informed of relevant news, events and other information about studying at Edinburgh Napier University.

If you apply to us through the University and Colleges Admissions Service (UCAS), a partner institution, we will receive the required data through electronic transmission and process your data through our Admissions Service at Edinburgh Napier University.

If you apply to us directly either through our on-line application process or through one of our international partners/agents, your data will be received directly in to our system and processed through our Admissions Service at Edinburgh Napier University.

What is the legal basis for processing?

Article 6(1)(b) – Necessary in order to take steps at the request of the data subject (prior to entering into a contract or, in this case, making an application to the University), including corresponding with you about your application and keeping you informed of further information related to your to the university.

Article 6(1)(e) – Processing is necessary for the performance of the University’s official authority as vested in the Data Controller by Scottish Statutory Instruments 1993 No.557 (S.76) as amended, that is, the provision of education.

Article 6(1)(c) – The University is required to comply with legislation and statutory obligations e.g. Student funding bodies, UK Visas and Immigration Service, and other government bodies and agencies.

Special Category (sensitive personal data)

Article 9(2)(g) as permitted by DPA 18 Pt2(2)(s10)(3) and Schedule1 S.16 for the processing of special category (sensitive) personal data for the purposes of providing support to individuals with particular disabilities or medical conditions and DPA 18 Pt2(20(s10) and Schedule1 S.8 for the processing of equalities monitoring information to comply with the Equalities Act 2010.
Article 10 as permitted by DPA 18 Schedule 1 Parts 1 & 2 and Schedule 2 for the purposes of public safety, security and the prevention and detection of crime and fraud, etc. e.g. The Home Office UK Visas and Immigration Agency, courses which require a PVG check, etc. Please see the University Admissions Policies and Student Privacy Notice for more information.

**How are we collecting this information?**

We are collecting information from the following channels:

- From Applications transmitted electronically via the processing portal provided by UCAS
- From Applications submitted electronically through our university web portal
- From Applicants and Offer Holders via email
- From authorised Student Recruitment Agents working on behalf of the University
- From recognised overseas partners e.g. China Office
- Occasional paper based information received through the mail service

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

We will collect and hold some or all of the required information about you, if you apply to study with us including:

- Personal and contact information e.g. names, addresses, email addresses and telephone numbers; and may also include images in photographs or films
- Education details, student records including examination certificates, transcripts and references.
- Any relevant employment details
- Financial information to verify your eligibility for fees and financial support
- Nationality

We may also need to process information, where necessary, which may be considered sensitive and is known as special categories of data, including:

- To meet a legal obligation such as immigration law or health and safety law
- Monitoring our compliance with equality law, only for applicants who apply to UK course
- To accommodate a special need you have disclosed to use such as dietary requirements or a disability

We may ask you to declare:

- Religious or other similar beliefs
- Racial or ethnic origin
- Sexual life, sexual orientation
- Physical or mental health details
- Alleged offences and offences
- *Criminal proceedings, sentences or outcomes you are expected to declare
Who can see your information within the University?

Your information can be accessed by staff employed through Edinburgh Napier University, including the Admissions Team, authorised student ambassadors, school support staff, academics, service colleagues and overseas offices.

Information and data sharing is only permitted internally to administer applications through the SITS record system.

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

Unless we have a legal basis for processing, as mentioned above we will not disclose your data without your consent to third parties, except where they are acting as authorised agents for the University for the above purposes or where we are permitted or required to do so by Data Protection Legislation. This includes:

- The Scottish Funding Council (SFC)
- Higher Education Statistics Agency (HESA)
- Student Awards Agency for Scotland (SAAS)
- Students Loans Company (SLC)
- UK Visas and Immigration (UKVI)
- Widening Access partners, where applicable

This list is not exhaustive.

How long is your information kept?

We will keep your information only for as long as we need it to provide you with the information or services you have required (notionally the current academic year + 1 year) to manage your contract with us, to comply with the law, or to ensure we do not communicate with you if you have asked us not to. When we no longer need information we will always dispose of it securely. (Anonymised statistics may be retained for a longer period of time and in line with our Data Retention Schedule which is updated annually).

Once applicants have become students different retention periods apply to their personal data – please refer to the Student Privacy Notice for more information.

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.

Please note we use the following secure 3rd party service to process your data.

- University and Colleges Admissions Service (UCAS)
Who keeps your information updated?

You have the right to update your own information at any time by notifying the Admissions Team of any changes to your personal data. You can write to us at Admissions Team, Edinburgh Napier University, Sighthill Campus, Sighthill Court, Edinburgh EH11 4BN or emailing us at: ugadmissions@napier.ac.uk or pgadmissions@napier.ac.uk You can also contact UCAS about the use of personal information at datagovernance@ucas.ac.uk, or write to: Data Protection Officer, UCAS, Rosehill, Cheltenham, Gloucestershire, GL52 3LZ.

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.

Only where the University deals with applications made from countries outside the EEA/adequate countries list.

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

*Criminal Convictions details are currently requested for subject areas that require PVGs through Disclosure Scotland. More information is available in the University’s Policy for Applicants with Declared Criminal Convictions: https://www.napier.ac.uk/study-with-us/undergraduate/how-to-apply/application-advice-and-support