

Layered Privacy Notice

Activity/Processing being undertaken: APPLICATIONS FOR STUDENT MOBILITY (Study or Traineeship)

Edinburgh Napier University is providing you with this information in order for us to comply with UK data protection legislation (“the legislation”), the UK Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation: EU 2016-679 (“GDPR”) and as amended by “EU Exit” Regulations 2019 and now known as the UK GDPR, 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)

- Your host university [or in exceptional cases your employer abroad]
- The European Commission
- The Turing Scheme administrators (Capita) on behalf of the UK Government
- The British Council, as National Agency acting on behalf of the European Commission
- ISEP (International Student Exchange Programme – applicants for ISEP exchange only)
- HESA (Higher Education Statistics Agency)
- Convera (formerly Western Union International Bank GmbH, UK Branch)*

*We do not share your information with Convera/Western Union directly, however if you receive a grant as part of your mobility you will have to upload your bank details onto a system owned by Convera/Western Union in order for us to pay the grant. You can view Convera’s privacy statement [here](#).

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:

- 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)?

For the purpose of administering your student mobility (study placement or traineeship) abroad, including complying with reporting requirements to funding bodies and statutory reporting to HESA, and administering any relevant grant.

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 for a study placement or traineeship abroad.

Article 6(1)(e) – As part of the University’s stated objects of providing education as per the University’s Statutory Instruments.

Article 6(1)(c) where processing is necessary for compliance with a legal obligation to which the controller is subject e.g. Travel/Study Visas, Equalities Act 2010, etc.

If you provide details of any additional support needs or medical conditions these will be processed under Article 9.2 (g) - as permitted by s.10(3) of the Data Protection Act 2018 for the processing of special category (sensitive) personal data for the purposes: Schedule 1:

- o Part 2(8) – Equality of opportunity or treatment
- o Part 2(16) – Support for individuals with a particular disability or medical condition

How are we collecting this information?

We will collect this information from the documentation you complete as part of your exchange application and any grant documentation, together with data obtained from the University's student records system.

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

- We will collect personal student data.
- This may include full name, date of birth; gender; address and country of residency; Edinburgh Napier email address; phone no; nationality; visa status; student ID; programme and year of study; academic averages; foreign language proficiency; financial status information (for those applying for visas or grants); bank details (for those in receipt of grants); medical/health condition or learning need (if disclosed and authorised to share); study or work placement abroad details; and any other information required to facilitate your mobility and the payment of any grant.

Who can see your information within the University?

- Global Mobility Team – all of the above.
- If you apply for additional funding/Scholarships, your application information will be shared with the Student Funding team and/or Development and External Relations team.
- If you are in receipt of a grant, your bank details will be visible to the Finance Team.
- This list is not exhaustive and other employees may see this information where it is relevant and necessary.

How long is your information kept?

Five years after the end of your placement/traineeship

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?

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 disposal. 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 of 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.

Who keeps your information updated?

- Students can update their own information via the Student Record portal.
- The Global Mobility Team will update the key information relating to your exchange. Staff from the School Support Service may also update/log information such as learning agreements, transcripts and marks obtained while on exchange on the University’s systems.
- If you will be in receipt of a grant, you will be responsible for loading and updating your own bank information to Convera/Western Union’s GlobalPay system. In exceptional cases, where you have been unable to make updates yourself, Convera/Western Union or a member of Edinburgh Napier’s Global Mobility or Finance team may make these changes on your behalf in order for your grant payment to be transferred successfully.

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

No

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

If you are going on a study exchange, your key applicant data will be sent to your host university. If you apply through the ISEP programme, the host university of your choice could potentially be in a country outside the UK, EEA and not included in the adequate countries list.

If you will be in receipt of an grant, you will be required to upload your bank and personal contact details to Convera/Western Union’s GlobalPay system. Convera/Western Union are compliant with GDPR and all data protection legislation relevant to the countries where they provide their services. The data they capture is stored in the USA for the term permissible under relevant legislation. You can view their privacy statement [here](#)

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 can find out who to contact if you have any further queries about Data Protection and about your rights using the following link:

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