

## Layered Privacy Notice

**Activity/Processing being undertaken:** Higher Education Achievement Report (HEAR)/Gradintelligence

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)?

We use the third party company Gradintelligence (Tribal Education Limited) as a “Data Processor” to provide your HEAR through a secure web portal.

You can read their Privacy Policy here: <https://gradintel.com/index.php/en/privacy-policy>

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)?

To enable you to access and use Gradintelligence services which include:

- An official electronic record of your accomplishments
- Easy access to your academic achievement summary
- The ability to share your HEAR with potential employers

Full information can be found here: <https://my.napier.ac.uk/Student-Administration/Pages/HEAR.aspx>

### What is the legal basis for processing?

Provision of and access to your HEAR is part of the University’s requirement to provide and administer all aspects of your studies. Therefore our legal basis is Article 6(1)(e): for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller, namely the University’s Statutory Instruments: “for the objects of providing education”.

Your use of Gradintelligence services is subject to the service [Terms](#) and [Privacy Policy](#); which describe the nature of the service and the terms on which the service is provided including the legal basis for processing your personal data and how to exercise your data rights under the GDPR using Gradintelligence’s online [Data Requests](#) service.

Using Gradintelligence you can choose to share your personal data with third parties, for example to share you HEAR to verify your credentials or to apply for a job or further study opportunity. Sharing your personal data with third parties requires your explicit opt-in consent, as per Article 6(1)(a) of the GDPR, and you can remove your consent at any time.

### **How are we collecting this information?**

From your SITs student record and directly from yourself through your use of the Gradintelligence system.

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

Edinburgh Napier University students and alumni:

- Personal and contact data
- Digital documents data and update history, used to create verified documents such as Higher Education Achievement Report, transcripts, degree certificates and proof of enrolment letters
- Academic and non-academic achievement data
- Research programme data
- Attainments data
- Communications and interactions between students and institution users

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

School Support Service staff and Student Systems staff.

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

Your information on your Gradintelligence service will be held for 12 months after non-registration or deactivation of your account.

The University will hold appropriate data permanently in accordance with our records retention schedules which can be accessed via the link below:

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?**

Information held by the University 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 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.

You can view the Privacy Policy for the Gradintelligence service here:  
<https://gradintel.com/index.php/en/privacy-policy>

Gradintelligence take protecting your personal information very seriously and employ all reasonable endeavours, including anti-virus protection, secure database servers and firewall technology, to protect your data.

They require their clients and business partners (where they have your consent to access your data), to operate similar approaches to data security.

You recognize, however, that the Web is not an entirely secure medium and we do not warrant that our efforts to protect your data from unauthorised access will always be successful.

**Who keeps your information updated?**

Either by the University or directly yourself

**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.**

Gradintelligence data is stored in secure UK data centres.

They do not transfer your personal data to others outside of the EEA unless you consent to it.

If you do use the Gradintelligence service to share your personal data with third parties, for example;

- if you share your electronic transcript or Higher Education Achievement Report with an embassy, employer or university to verify your credentials
- if you apply for a matched opportunity by submitting an online application
- if you share your credentials with LinkedIn to update your certifications

They will ask you, when you initiate the transfer of data, to confirm that you understand;

- what personal data they are sharing on your behalf
- that the third party you are sharing your data with may be located overseas
- that you understand that they are not in control of how your data may be subsequently processed by that third party
- their relationship, if any, with the third party

We will keep records of the consent you give us to transfer your personal data and you will have the opportunity to withdraw your consent prior to third party access.

**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>