

## Layered Privacy Notice

**Activity/Processing being undertaken:** Students studying on Edinburgh Napier University Joint Supervision Research programme with the support of our international partner institutions

Edinburgh Napier University is providing you with this information in order for us to comply with the UK Data Protection Act 2018 and 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?

A – Edinburgh Napier University as the “Data Controller”.

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

A – Your external supervisor, from the Higher Education partner identified in the Joint Research Supervision Agreement as a “Data Controller” (hereinafter referred to as the Partner) for the purpose of providing academic and pastoral support when studying at the partner’s University’s campuses.

Unless we have a legal basis for processing, we will not disclose your data without your consent to other 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, please see the main Student Privacy Notice at [staff.napier.ac.uk/dpstatements](http://staff.napier.ac.uk/dpstatements).

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

To enable you to undertake studies with Edinburgh Napier University on the programme delivered in collaboration with the Partner.

Where processing is necessary to:

- Provide and administer all aspects of your studies with the University e.g. admission, matriculation and progression.
- Provide you with advice and support on academic, careers, pastoral and any relevant matters at Edinburgh Napier University’s campuses or the Partner’s premises.
- Administer the financial aspects of your payment of fees and the collection of debts owed.

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

Processing is necessary for Edinburgh Napier University's purposes 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, for the purposes of providing education and research.

As data is shared with a third party country outside the EEA, appropriate safeguards are put in place through the use of contract and the EU Model Contract Sections as approved by the European Commission, so as to maintain the security of the data and your rights under relevant Data Protection legislation.

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

Online or paper application

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

Information pertaining to you and your supervisor from the Partner whose role is identified in the Joint Supervision Research Agreement

## **Student Information collected:**

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 reference.
- 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:
  - 1) To meet a legal obligation such as immigration law or health and safety law
  - 2) Monitoring our compliance with equality law
  - 3) 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

**Staff information collected:** The University processes personal data for the purposes set out above in this notice. This may include: personal and family details; and education and employment details.

### **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.

### **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 requested, 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 main Student Privacy Notice and the [University Records Retention Schedules](#) 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 data centres are resilient with secure access controls and business continuity measures in place, including regular backups to prevent data loss. 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.

The University is Cyber Essentials accredited.

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

Yourself via Edinburgh Napier University’s online services.

**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?**

This information is provided to supplement the University's main Privacy Notices and it is recommended that appropriate notices are reviewed to provide full information about how the University processes personal data.

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>