

## Layered Privacy Notice

### Activity/Processing being undertaken: – Employee Mentoring Programme

Edinburgh Napier University is providing you with this information in order for us to comply with UK Data Protection legislation, 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)?

The University is providing the MentorNet platform to staff members to enable them to take part in mentoring activities, both as mentors and mentees. This provides staff learning and development opportunities and benefits for all. Academic mentors can evidence their mentoring skills as required by the Academic Framework and for their MyContribution objectives, whilst Professional Services mentors can also use this as an opportunity for ongoing professional development along with evidencing their mentorship for their MyContribution objectives. There are, of course, many developmental benefits for mentees by learning from a mentor’s experience and expertise, as well as having their support and encouragement.

Special category (sensitive) personal data will be collected, where appropriate, for equalities monitoring purposes and where there are specific requirements for matching mentees with mentors e.g. same gender, ethnicity, etc.

System administrators in HR Learning & Development, Research, Innovation & Enterprise, the Department of Learning & Teaching Enhancement and in your academic school (where relevant) will manage the system to administer your participation in the University’s Mentoring Programme which supports staff in achieving their career goals.

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

The University uses a secure third party software application/web service, MentorNet, for the purposes of managing and developing a mentoring relationship between you and your mentor/mentee and this includes processing any personal data you have provided for these purposes. This will involve all personal data that you input into MentorNet and includes using your personal data to match you with a suitable mentor/mentee, facilitating communication between you and your mentor/mentee, reporting on activity, etc.

MentorNet, provided by sfG MentorNet Ltd, processes your personal data held on MentorNet to provide the following services for the University which may involve processing your data: storing information on MentorNet including your personal data, monitoring forums, messages, and activity, editing or deleting content or material which is deemed inappropriate, etc.

sfG MentorNet Ltd will not process your data for any purposes other than those above, or as instructed by the University, nor will they share your data with any person, firm or organisation unless requested to do so by the University.

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

Article 6(1)(b): “processing is necessary for the performance of a contract to which the data subject [employee] is party” which is your contract of employment. This processing includes services that are provided as part of employee learning and development opportunities.

Article 9(2)(g): “Processing is necessary for reasons of substantial public interest” as allowed for in the derogations in the DPA 2018 Schedule 1 Part 2, including, S.8 Equality of opportunity or treatment

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

You will provide your details to create an online profile (on the MentorNet system). ENU administrative staff will moderate this information before the profile goes live.

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

We will collect your name and email address in order to register your account. You will then provide a personal profile which serves as an introduction for mentors/mentees to get to know a bit more about the colleague they are mentoring/being mentored by. This optional information may include details ‘About me’, a contact phone number, links to your personal profiles on other sites (such as LinkedIn and Worktribe), and information on the skills which you wish to build/offer as a mentee/mentor (respectively). Additional information uploaded during the course of the mentoring relationship e.g. correspondence, documents, etc. will be retained within MentorNet in line with our retention policy below.

Minimal special category (sensitive) personal data will be collected for the purposes specified above, including gender, ethnicity, etc.

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

ENU staff managing the system and mentorship programme, as above, to enable them to match you with mentors, other participants registered on the system and the mentor with whom you have been matched will have access to your \*public profile (which does not include your contact number).

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

Your MentorNet profile will be deleted from the MentorNet system when you leave the programme. Information from the MentorNet profile is not exported to other university systems.

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?**

MentorNet store your data in secure data centres within the UK. MentorNet data is hosted on the Microsoft Azure platform. Azure meets a broad set of international and industry-specific compliance standards, such as ISO 27001, HIPAA, FedRAMP, SOC 1 and SOC 2, as well as country-specific standards, such as Australia IRAP, UK G-Cloud and Singapore MTCS.

**Who keeps your information updated?**

As all users have access to their profiles in MentorNet it is up to all individuals to ensure that their information is accurate and up-to-date, and to update it as/if necessary. We will prompt users to regularly check that their information 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 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>