

## Layered Privacy Notice

### Activity/Processing being undertaken: Administering the booking and provision of Summer Accommodation

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)?

No external third parties, however the systems used to process data are provided by external software companies e.g. Microsoft.

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)?

Process your accommodation booking

Keep you updated on accommodation release dates, special offers & competitions and retain you as a customer.

### What is the legal basis for processing?

The information you have provided to arrange your Summer Accommodation booking will be processed in terms of Article 6(1)(b) of the GDPR as it is necessary for the performance of a contract (i.e. our responsibility to provide you with the accommodation)

Where you have given permission for us to contact you about updates on availability, release dates, pricing and special offers from the University, your information will be processed under your consent as per Article 6(1)(a) of the GDPR.

You can withdraw your consent at any time by emailing [vacationlets@napier.ac.uk](mailto:vacationlets@napier.ac.uk)

### How are we collecting this information?

From your summer accommodation booking form.

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

1. Private summer accommodation bookers.
2. Name, address, email address & phone number.
3. Payment information is processed by the Finance team.

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

Conference & Events Department. Finance Department.

**How long is your information kept?**

Your contact information will be held indefinitely unless you remove your consent to receive marketing.

Payment information is held by the Finance Department for 6 years

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?**

Your 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 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?**

Conference & Events Department.

**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>

