



Layered Privacy Notice

Activity/Processing being undertaken: Upskilling short courses

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

We will share anonymised data with the Scottish Funding Council.

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. There may be circumstances where we are required to disclose your data to other external third parties, including where we:

- have serious cause for concern for your safety,
- 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)?

The course funding body, Scottish Funding Council, requires us to collect anonymised data to ensure equal access to courses.

What is the legal basis for processing?

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, carrying out research, and promoting teaching, research and general scholarship” and the administration thereof.

How are we collecting this information?

Direct from data subject.

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

- Age range
- Gender
- Ethnicity
- Disability
- Postcode

Who can see your information within the University?

Course organiser and Planning and Business Intelligence

How long is your information kept?

We will retain this information for one year after the course end date.

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. 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. The University is [Cyber Essentials Plus](#) accredited.

Who keeps your information updated?

Yourself by notifying the University of any changes to your details.

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>