

Layered Privacy Notice

Activity/Processing being undertaken: Registration & Participation in a Widening Participation Project

Edinburgh Napier University is providing you with this information in order for us to comply with the General Data Protection Regulation (EU) 2016/679 and Data Protection Act 2018, which require 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)?

Your data will not be shared with any third party.

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)?

We use your data to allow successful participation in our widening participation projects. We will use your details to communicate with you about the project, provide information, advice and guidance on further and higher education and inform you of any relevant activities and opportunities that may support the transition into further or higher education.

We may ask your feedback about the project to measure satisfaction as part of our commitment to continuous improvement and evaluation and may use your information to research your educational outcomes and destinations during and after school or college. We may also use your data for monitoring and tracking reports to support pupil or student progression. This is to ensure we measure the effectiveness of our activities.

What is the legal basis for processing?

Where you have given permission for us to contact you about further events or services your data will be processed under your consent as per Article 6(1)(a) of the GDPR - the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Your personal data will be also processed in terms of Article 6(1)(e) – Processing is necessary 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, the provision of education.

We will only contact you about our upcoming events, provide you with information, advice & guidance about further & higher education if we have your express consent to do so. We may send you post, unless you have asked us not to. You can withdraw your consent/opt-out of being contacted by the University for the purposes above at any time by sending an email to the Widening Participation Team at wideningaccess@napier.ac.uk with OPT-OUT as the subject line.

How are we collecting this information?

We are collecting this information from the following sources:

- paper application form
- via tablets or laptops at events in an electronic format
- web form on www.napier.ac.uk
- NoviSurvey
- Eventbrite.

In order to facilitate some of our online bookings for other events, we sometimes use Eventbrite - a third party service which is not operated by Edinburgh Napier University. Details of Eventbrite's privacy policy can be found at:

https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB

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

We will be collecting information of the students and/or the information of their parent/carer.

First Name, Last Name, Email, Home phone number, Mobile, Date of Birth, Address details, postcode, Parent/Carer first name, Parent/Carer last name, Parent/Carer email, Parent/carer mobile, Parent/carer home phone number, School, School year group, Current School Subjects, Exam Results, Widening Participation personal information.

Who can see your information within the University?

Your information can only be accessed by the Edinburgh Napier University Widening Participation Team and authorised student ambassadors.

How long is the information kept?

Student (and/or their parent/carer) Information may be retained for up to 7 years dependant on the level of engagement and the school or college year that you registered to become part of the project. We will hold data of the student (and/or their parent/carer) for at least 1 year after the student leaves school or college.

For example, a S6 student (and/or their parent/carer) data will be retained for 2 years including the final year of school. A student in S1 will have their data (and their parent/carer) retained for 7 years including the final year of school. These examples are intended as a guide and it will depend on your level of engagement with our widening participation projects.

Further information can be found online at:

<https://staff.napier.ac.uk/services/governancecompliance/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.

All Edinburgh Napier University staff who have access to your information have received thorough data protection training. We only use third party systems to store and process your data for which we have completed a risk assessment exercise to ensure your data is secure.

Please note we use the following secure 3rd party applications to process your data:

- **CRM Database**

The University’s Enquiry Management System, MS Dynamics CRM, is commissioned by Edinburgh Napier (Data Controller), hosted by a third-party provider Crimson Consultants in conjunction with the Microsoft Corporation. The University takes its obligations with your data very seriously and will ensure that all appropriate safeguards and security provisions are in place and full compliance with its third-party agreements and privacy notice are monitored. If you would like further information, please see Microsoft Dynamics CRM privacy policy

- **Gecko (Data Collection Tool)**

Please note that the University uses a secure third-party data-capture application, GeckoForm, to manage the data you have provided. The application is only used for the purposes of capturing and backing-up your contact data and will not be used for any other purposes and your data will not be added to any mailing list or shared with any other third parties. We value your feedback and privacy – if you would like further information please see Gecko Lab’s privacy policy <http://www.geckolabs.co.uk/privacy-policy/>

Who keeps your information updated?

You have the right to update your information at any time by opting out of our projects or notifying the Widening Participation Team of any changes to your personal data.

The Widening Participation team can also update your data.

Will your information be used for any automated decision making or profiling?

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/governancecompliance/governance/DataProtection/Pages/default.aspx>