



Privacy Notice

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

Name of Process:

*Data Controller	Edinburgh Napier University
*Purposes for collection/processing	Provision of Vivup – Employee benefit platform
*Legal basis	<p>[Based on the information above we will decide what the legal basis for processing is e.g. Article 6(1) of the General Data Protection Regulation]</p> <p>[Where Art 6(1)(a) or Art 9(2)(a), consent, is the basis for processing then individuals must be advised of their right to withdraw consent at any time and how to do so.</p> <p>Where either Art 6(1)(b), performance of a contract, or Art 6(1)(c), legal obligation, are the basis for processing then the individual must be made aware of the possible/consequences of failure to provide the personal data requested.</p> <p>The legal basis the University relies on is 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 <u>Statutory Instruments</u>: “for the objects of providing education, carrying out research, and promoting teaching, research and general scholarship” and the administration and support thereof.</p> <p>Where Art 6(1)(f), legitimate interests, is the basis for processing the individuals must be advised what these legitimate interests are for the data controller/third party – use of this condition will be very restricted for the University as a ‘public authority’ and consultation with Governance Services is required.]</p>
Whose information is being collected	Employee
What type/classes/fields of information are collected	<p>Email address: Employee number: Name</p> <p>Employees will then opt into register on the platform and share additional information, as required with what benefits provider they wish to engaged with.</p>



	<p>Employees can request for their information to be removed.</p> <p>Any other information will be provided by employee direct to benefit platform or benefit providers, if they wish to purchase or engage with any benefit offerings, or discounts.</p>
Who is the information being collected from	Data Controller – Edinburgh Napier University
How is the information being collected	From University Systems, namely HR Connect.
*Who is personal data shared with internally and externally	SME HCI Limited and all Group Companies, trading as Vivup whose registered office is 5 Margaret Road, Romford, Essex, United Kingdom, RM2 5SH whose company number is 05558651 (the “Service Provider”)
How secure is the information INTERNAL INFORMATION ONLY	Information is shared vis email, with an encrypted password to Vivup.
Who keeps the information updated	The University is responsible for keeping the information updated. Will update Vivup with Joiner and Leaver monthly.
*How long is the information kept for	Information is held in line with the retention schedule.
*Will the data be used for any automated decision making	No
*Is information transferred to a third country outside the UK?	No
<p>*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</p> <p>*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</p>	