**Layered Privacy Notice [template]**

**Activity/Processing being undertaken: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

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?**

A – Edinburgh Napier University as the “Data Controller”.

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

A – [Company/Organisation name] as a “Data Processor”.

A – Any other parties this will be shared with?

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)?**

A – (purpose 1, 2, etc. if appropriate).

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

[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]

[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.

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.

Where Art 6(1)(e), performance of a task in the public interest/exercise of official duty vested in the Controller, is the basis for processing detail the task/official duty.

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.]

**How are we collecting this information?**

A – [from the data subject, named third party, etc.]

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

A - [whose data/categories of data subjects e.g. students, employees, alumni, etc.] –

A - [what type/classes/fields of data e.g. name, identifying numbers, contact details, sensitive personal data, education details, financial information, vetting data, etc.]

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

A –

**How long is your information kept?**

A –

Further information can be found online at: <http://staff.napier.ac.uk/services/secretary/governance/records/Pages/RecordsRetentionSchedules.aspx>

**How secure is your information?**

A – 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 or your personal data.

A - For services hosted externally or in the cloud, [you should consult the specific privacy notice for the service].

**Who keeps your information updated?**

A –

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

A –

[If the answer is ‘yes’ meaningful information about the logic involved, significance and envisaged consequences of such processing to the individual must be provided.]

**Is information transferred to a third country? Outside the EEA and not included in the adequate countries list.**

A –

**Is any other information available?**

A – You can access all the University’s privacy notices using the following link: <http://staff.napier.ac.uk/services/secretary/governance/DataProtection/Pages/statement.aspx>

A - You can find out who to contact if you have any further queries about Data Protection and about your rights using the following link: <http://staff.napier.ac.uk/services/secretary/governance/DataProtection/Pages/default.aspx>