

EDINBURGH NAPIER UNIVERSITY

COURT MEMBERS PRIVACY NOTICE

1. Introduction

Edinburgh Napier University is a data controller for the purposes of data protection legislation: the General Data Protection Regulation: EU 2016-679 (“GDPR”) and the UK Data Protection Act 2018 (“DPA 18”) and processes the personal data of Court members strictly in line with this legislation and its notification to the UK Information Commissioner’s Office (ICO).

2. Purposes

The University gathers and processes personal data necessary for purposes related to the administration and requirements of your governing body membership. Such data includes, but is not limited to, contact details, biographical details, bank details for expenses, vehicle details for parking, photographs, equality monitoring data and register of interests/charity trustee declaration data.

3. Legal Bases for Processing

The primary legal basis for processing your personal data is in article 6(1)(e) GDPR “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.

Other relevant bases include:

- Art. 6(1)(c) “processing is necessary for compliance with a legal obligation to which the data controller is subject”
- Art. 6(1)(b) “processing is necessary for the performance of a contract to which the data subject is party” e.g. if you apply for a campus car parking permit
- Art. 6(1)(f) “processing is necessary for the purposes of the legitimate interests pursued by the controller” e.g. it is in the legitimate interests of the University to retain contact details after you demit membership to allow us to remain in contact on the basis of an ongoing relationship of mutual interest with the University as a former governing body member*
- Art 9(2)(g) as permitted by DPA 18 Pt2(2)(10)(3) for the purposes of monitoring equalities data and as detailed in the University’s Inclusion Statement
- Art 9(2)(j) “processing is necessary for archiving purposes in the public interest or historical research purposes”

In accordance with these requirements, and those of the Scottish Code of Good HE Governance, we publish information on your Court membership, register of interests’ disclosure and biographical details online and in a range of University publications.

*Contact details are maintained by the University’s Development and External Relations team on the Raiser’s Edge database: <https://www.napier.ac.uk/alumni/privacy-policy>

4. Disclosures to Third Parties

We disclose information to third parties where necessary, required or permitted in accordance with the purposes above, including the Scottish Funding Council (SFC), Universities Scotland, OSCR, Companies House and the University’s professional advisors. We disclose anonymised equality and diversity data which you choose to provide to us within our return to the Higher Education Statistics Agency (HESA) as required by the Scottish Funding Council (SFC).

5. Retention

We retain and dispose of records containing personal data in accordance with our [records retention schedules](#).

6. Further Information

For more information about how the University processes personal data and who to contact in relation to data protection matters and rights please use the following link:
staff.napier.ac.uk/dataprotection

Document Control Information	
Title	Court Members Privacy Notice
Version	v.1.0
Author	Governance Services
Date Approved	20180703
Review Date	Biennially or earlier as appropriate
Scope	All University Court Members