

## **Privacy Notice – Cashless Catering**

Edinburgh Napier University provides this information to explain how we use your personal data. Protecting your personal data is important to us and we only collect and process data which is necessary for us to provide the information, services and goods you require. This is in compliance with UK data protection legislation (“the legislation”), that is, the UK Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation: EU 2016-679 (“GDPR”) as amended by “EU Exit” Regulations 2019 and now known as the UK GDPR.

### **Who is collecting the information?**

Edinburgh Napier University as the “Data Controller”.

### **Why are we collecting it/what we are doing with it (purposes)?**

We are collecting your personal data in order to provide you with access to the University’s cashless catering and loyalty scheme, specifically, to provide you with the option of using your University staff or student card as a payment method. We transfer the data to the Data Processor in order to allow you to register to use the University’s cashless catering and loyalty scheme with your University email address. Your account is not active until you register and validate your account for use.

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

MCR Systems as a “Data Processor”. MCR Systems are the providers of our EPOS system and Cashless & Loyalty solution.

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

Article 6(1)(b), performance of a contract, is the basis for processing. The University requires your personal and financial data in order to process purchase transactions and cannot do so without this information.

### **How are we collecting this information?**

The information being submitted is collected from the University’s HR system, Student Record system and Access Control system.

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

We are collecting information about current University staff and students.

The personal data being supplied is name, University email address and University staff/student card serial number.

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

Controlled users of the catering system, authorised Information Services staff who maintain the data interface between systems and authorised Data Processor users from MCR Systems. No one has visibility of any debit/credit card details.

### **How long is your information kept?**

Transactional data cannot be deleted and will remain for the lifetime of the system. The data can, however, be anonymised if requested. Accounts which remain unused will be reviewed and deleted at reasonable intervals.

### **How secure is your information?**

Your information is stored in a secure, PCI DSS compliant environment which complies with ISO 9001 and ISO 27001 quality and information security standards.

**Who keeps your information updated?**

You are responsible for keeping your personal details up to date.

**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?**

\*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 URL:

<https://www.napier.ac.uk/privacy-policy>

\*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://www.napier.ac.uk/privacy-policy>