



Layered Privacy Notice

Activity/Processing being undertaken: Commercial Programmes – Contact with Professional Associates

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”.

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

Your data will not be shared externally.

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)?

To maintain contact with established Professional Associates and promote future events to those who have attended previously.

What is the legal basis for processing?

Where you have been involved with Commercial Programmes previously as a Professional Associate or are an Alumni of the University (and have given us permission to contact you about future events or services) your data will be processed under your consent as per Article 6(1)(a) of the GDPR.

Or

We may have contacted your place of business directly based on information gained from publicly available sources; in this situation we are processing your data (corporate/business email address) to make initial contact with you in terms of Article 6(1)(f) of the GDPR as it is in the legitimate interests of the University to make contact with potential Professional Associates for its Commercial Programmes. Any further contact would be as per your consent.

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 tbscommercial@napier.ac.uk with OPT-OUT as the subject line. We will also provide opt-out options in all communications we send to you.

How are we collecting this information?

Either from you directly or from publicly available information.

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

- Attendees of our CPD courses, Professional Associates and Alumni
- Name, identifying numbers, contact details, email address, company address,

Who can see your information within the University?

TBS commercial team, the Dean of Business School and appropriate academics who run CPD programmes

How long is your information kept?

We will keep your information only for as long as we need it to manage your relationship with us, to comply with the law, or to ensure we do not communicate with you after you have asked us not to. When we no longer need information we will always dispose of it securely. Further information can be found online at:

<https://staff.napier.ac.uk/services/governance-compliance/governance/records/Pages/RecordsRetentionSchedules.aspx>

How secure is your information?

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 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.

Who keeps your information updated?

TBS Commercial team at Napier

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>