

Layered Privacy Notice

Activity/Processing being undertaken: CERTIFICATE OF PROFESSIONAL DEVELOPMENT COURSES/TOP UP DEGREE COURSES RECRUITMENT

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?

Edinburgh Napier University as the “Data Controller”.

Who are we sharing your Personal Data with (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 either:

- Record and respond to your enquiry
- Register your interest in applying for an ENU Certificate of Professional Development course (CPD)
- Let you know about the above course

What is the legal basis for processing?

Where you have submitted an enquiry or registered interest your personal data will be processed in terms of Article 6(1)(b) of the GDPR as it is necessary for the performance of a contract (i.e. our responsibility to provide you with the information requested or administer your attendance at an event you have registered for)

Where you have given permission for us to contact you about further 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 advertise its course directly to those who may find it of interest. 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 via webform, email, registration at events or from publicly available information

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

Prospective students and business leads:

Name, identifying numbers, contact details, education details

Who can see your information within the University?

Members of the TBS Commercial, Admissions, Finance and Systems teams.

How long is your information kept?

We will keep your information only for as long as we need it to provide you with information or services you have required (notionally the current academic year + 1 year) 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. (Anonymised statistics may be retained permanently). 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 or 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

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?

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>

You have a number of rights available to you with regards to what personal data of