

**Layered Privacy Notice**  
**Library Membership: External Members**

**Activity/Processing being undertaken: Library Management System,  
Membership criteria, borrowing and other access and related communications**

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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.

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

Personal information, names, contact details and where appropriate home university status are collected in order to enable access to and borrowing of, items from the libraries, and communications relating to these activities. The University cannot provide or administer the library services without processing personal data.

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

As per Art 6(1)(b) of the General Data Protection Regulation as we require to process your personal information in order to provide you with library services and manage our services to you as part of a contract. If we are unable to process your personal data we will be unable to make the library services available to you.

Where appropriate, the University relies on Article 6(1)(e): for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller, namely the University’s Statutory Instruments: “for the objects of providing education, carrying out research, and promoting teaching, research and general scholarship” and the administration and support thereof.

**How are we collecting this information?**

Input by applicants via online external membership forms

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

- Applicants for external membership, including Alumni of the University and members of [SCONUL](#) and other organisations with which the University has agreements, and members of the public.
- Name, contact details and where applicable, details of Alumni, SCONUL home university or other status.

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

Information Services staff, Finance department and potentially other colleagues where there is a valid legal basis for the processing to take place.

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

Please note that the University uses a 3<sup>rd</sup> party (ExLibris) as a “Data Processor” to manage your library membership. You can find more information on ExLibris via the link below:

<http://www.exlibrisgroup.com/>

### **How we will contact you?**

We may contact you by telephone, email or post.

The University Library will use the email address to keep you updated with University Library related information and as the primary means of communication with you. It is your responsibility to regularly check this email address to ensure you do not miss important information. Please keep your details up-to-date to ensure we have your current email and home address.

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

Any financial records will be held for 6 years after your membership with the library ends. All other personal information will be held for one year after your membership ends.

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

Your information is stored securely by our 3<sup>rd</sup> party provider Ex Libris in their European Data Centre. You can find more information via the links below:

Ex Libris Cloud Services - <http://www.exlibrisgroup.com/services/cloud-services/>

Ex Libris Privacy Policy - <http://www.exlibrisgroup.com/privacy-policy/>

### **Who keeps your information updated?**

Data is updated by Information Services staff as advised by yourselves, as members.

### **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>