

**Layered Privacy Notice**  
**Library Membership: University Staff and Students**

**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.

**Who is collecting the information?**

Edinburgh Napier University as the “Data Controller”.

**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/>

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:

- 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)?**

Personal information, names, contact details and University account details are collected in order to enable access to and borrowing of, items from the libraries, and communications relating to these activities

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

**For students:** As part of the University’s stated objects of providing education, research and in terms of Article 6. 1. (b) of the General Data Protection Regulation.

**For staff:** As per Art 6(1)(b) 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.

**How are we collecting this information?**

Your information is collected from the University’s student and staff databases.

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

- Edinburgh Napier staff and students and Associate staff
- Name, matric or staff numbers, contact details, module and course details

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

Information Services staff

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

Any financial records will be held for 6 years after you leave the University. All other personal information will be held for one year after you leave the University.

### **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 from central University staff and student systems

### **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>