

## Privacy Notice

Name of Process: **Sending internal communications and surveys to staff and students using Poppulo software (external software as a service).**

Edinburgh Napier University is providing you with this information in order for us to comply with UK data protection legislation (“the legislation”), the UK Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation: EU 2016-679 (“GDPR”) and as amended by “EU Exit” Regulations 2019 and now known as the UK GDPR, which requires us to tell you what we do with your personal information.

Data Controller	Edinburgh Napier University.
Purposes for collection/processing	To send relevant communications to University staff and students via their University provided email addresses. The data will be used to target communications as necessary and appropriate. Poppulo uses the personal data uploaded to target communications appropriately and ensure that staff and students are receiving communications relevant to them based on their personal data. Poppulo also provides the University with engagement metrics such as email opening and link clicking rates, which enable staff administering the system and communications to tailor and improve future communications.
Legal basis	Staff: UK-GDPR Article 6(1)(b), processing is necessary for the performance of the employee/employer contract. Failure to communicate would exclude individuals from receiving news, updates and information about the institution and from the opportunity to contribute opinions.  Students: UK-GDPR 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.
Whose information is being collected	Staff and Students
What type/classes/fields of information are collected	Staff: Name, email address, job level, job role, department and location. Staff must not include any personal data, theirs or others, in any comments or responses where free text survey responses are available in surveys.  Students: Name, University email address, course code/description, course year, final year, mode of

	attendance, multiple enrolments, on campus, research course, school code/description, status code/description, undergrad/postgrad, university accommodation, visa student.
Who & how is the information being collected from	Staff: Data subjects, internally via HR Connect.  Students: As provided by students during the application and enrolment processes, including matriculation, via the Student Record System (SITS).
Who is personal data shared with externally	The software provider, Poppulo. This relationship is governed by contract.
Who keeps the information updated	Staff: Changes of individuals' personal data is done self-service through HRConnect or via Managers or HR. Organisational changes will be updated by HR to HRConnect.  Students can update their personal information using their MyAccount/eStudent Record online: <a href="https://evision.napier.ac.uk/si/sits.urd/run/siw_lgn">https://evision.napier.ac.uk/si/sits.urd/run/siw_lgn</a>  Personal data (new and amendments) is regularly updated automatically from University systems to Poppulo.
How long is the information kept for	Records are not regularly deleted as this would affect the analytics record support and compromise the University's ability to use the information for future analysis and comparison. Analytics information is anonymised.  Once the contract with Poppulo terminates, the data will be deleted within 90 days.
Will the data be used for any automated decision making	No
Is information transferred to a third country? Outside the UK, EEA and not included in the adequate countries list.	No
<p>*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: <a href="https://www.napier.ac.uk/privacy-policy">https://www.napier.ac.uk/privacy-policy</a></p> <p>*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: <a href="https://www.napier.ac.uk/privacy-policy">https://www.napier.ac.uk/privacy-policy</a></p>	

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