

Project VISION Sensor Technology Privacy Notice

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.

Name of Process: Project VISION Sensor Technology Privacy Notice

Data Controller	Edinburgh Napier University
Purposes for collection/ processing	<p>Project VISION is about delivering the University’s future strategy and the future of the University over the next years and decades, ensuring it is supported by the necessary estates and infrastructure to meet the needs of our diverse University community. It is looking at the future of teaching, the future of research, the future of technology, and how we plan for all of those.</p> <p>Our estates and infrastructure, including digital infrastructure, need to be flexible and fit for the future in terms of the changing size and shape of the University, and Project VISION aims to deliver that.</p> <p>More information about Project Vision can be found online by searching for the University Strategy/Project Vision.</p> <p>In order to plan for the future, the University needs to understand how the University estate is currently used, and to do this it is necessary to undertake work to measure the current usage and occupancy of rooms and spaces on Campus. This will allow us to make data-driven decisions about future developments e.g. space configuration, number and size of rooms required, etc.</p> <p>To enable the accurate collection of data it is necessary to install sensor or similar technologies to measure occupancy and utilisation of rooms. The initial pilot and the introduction of the technology is part of Edinburgh Napier’s wider roadmap to develop a “Smart Campus” underpinned by the University’s Digital Strategy. The aim of this project is to install and connect sensor devices in 35 rooms across the 3 campuses for a 26-week period initially from 20 November 2023. This will address</p>

	<p>the immediate business need to pilot sensor technologies, whilst implementing a solution and data platform that will provide a foundation for the longer-term requirements of a Smart Campus.</p> <p>The technologies being employed are heat sensor and fisheye cameras, used in combination to ensure accurate counts of occupancy are collected. Recorded images are stored independently in a highly secure environment. Integrated analytics tools mean that the only data the University intends to extract are counts per space / statistics rather than any personal data from which individuals can be identified.</p>
Legal basis	<p>The legal basis the University relies on is 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", "to do anything incidental ... to the furtherance of the objects of the University" and the administration and support thereof.</p> <p>We do not intend to process, or anticipate processing, any special category personal data. In the event this is processed, though, our lawful basis will be substantial public interest under Paragraph 6, Schedule 1 of the Data Protection Act 2018 (i.e. based on our statutory functions, and which is proportionate to the aim pursued, respects the essence of the right to data protection and provides specific measures to protect the fundamental rights and freedoms of the data subject).</p>
Whose information is being collected?	<p>The data gathered is expected to predominantly relate to University staff and students. Any other visitors utilising the rooms, however, will also be counted.</p>
What type/classes/ fields of information are collected?	<p><u>1) Portal Beam Sensors</u> This technology uses thermal imaging to assess room usage.</p> <p><u>2) Fisheye cameras</u> The devices make visual recordings in the same way as CCTV and with the same levels of security in place. The resolution of these cameras is unlikely to capture any data on screens or monitors within the rooms. Where appropriate, "privacy zones" will be configured to ensure that specific areas of the field are not recorded (e.g. where these might record personal or sensitive data not of interest to the study).</p>
Who is personal data shared with internally and externally?	<p><u>Internal:</u> Whilst it is not envisaged that there will be any requirement to routinely access the recorded data, a small number of University colleagues in Information Services and the University Security team will have controlled access in exceptional circumstances, where strictly required for maintenance and security purposes</p>

	<p>e.g. in the event of a security incident, in line with section 12.2 of our CCTV Code of Practice)</p> <p><u>External:</u> Whilst Sword Ping, an existing, trusted supplier for Edinburgh Napier University, have been chosen to provide the equipment, no personal data will be shared with them. They do not have access to the recorded footage for processing purposes.</p> <p>No external parties will ordinarily have access to any of the processed personal data, although the University may be required to comply with statutory requests for access by external parties (e.g. law enforcement agencies) in unusual circumstances.</p>
<p>How long is the information kept for?</p>	<p>Recordings, which are visual images only, are deleted daily. The extracted statistical data, which does not constitute personal data, will be kept longer term, as necessary for a project of this size.</p>
<p>Will the data be used for any automated decision making about individuals? No.</p>	
<p>Is information transferred to a third country outside the UK? No.</p>	
<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: https://www.napier.ac.uk/privacy-policy</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: https://www.napier.ac.uk/privacy-policy</p>	