

# **UCD Estate Services Privacy Notice - Access Control System**

## Introduction

This privacy notice explains how and why your personal data is used as part of the access control system.

The access control system is a wired and wireless, online and offline door electronic solution that facilitates access to electronically locked doors. Users are granted access rights to a user profile and associated access control credential, such as a staff or student ID.

## Who are we?

This privacy notice is for University College Dublin, Belfield, Dublin 4, Ireland, in particular for Estate Services. You can contact us via email, <a href="mailto:estates@ucd.ie">estates@ucd.ie</a> or by phone, (01) 716 7000.

The University fully respects your right to privacy and actively seeks to preserve the privacy rights of those who share information with the University. Any personal information which you volunteer to the University will be treated in accordance with Irish and European Data Protection legislation.

#### Why and how do we collect and process the information and for how long we keep it?

We collect your personal data through the Access Control system for the following purposes:

- of utilising a campus wide access control system to manage access to appropriate areas on the UCD estate, on the basis of legitimate interest.
- of entering into a legally binding contract with UCD, the tenancy agreement during the period of residence, on the basis of the performance of a contract.
- where it is necessary for the performance of tasks and functions we carry out under the Universities Act 1997, and related legislation, which form the basis of our University operations.
- To provide and manage access to controlled areas for UCD students, student residents, staff, and service providers
- To protect against theft, vandalism, trespassing, or other criminal offences
- To protect against anti-social behaviour
- To support the maintenance of safety and security of UCD students, staff and members of the public (UCD Community) using the UCD grounds and facilities, which can be included as evidence in insurance claims processes
- For the security of UCD property and goods.
- To support Estate Services staff in their operational duties to maintain the function of the estate
- To provide evidential material to An Garda Síochána (or other law enforcement bodies) where necessary and appropriate
- To investigate breaches of UCD policies and codes, including the Student Code of Conduct, Disciplinary Statute and the UCD Residences Licence to Reside

We will collect the following types of personal data:

- Name
- Staff / student / V number

in order to create an access control profile for a user, and

Access control logs of user activity

Access control logs of user activity are retained for two years, unless there is a legal basis that requires the retention of the footage for longer e.g. criminal activity, for investigative purposes, to comply with Data Subject Access Requests, or if the footage contains material applicable to the purposes listed above. Personal data recorded to create an access control profile will be deleted within one year of the expiry of the user as actively registered in UCD as a staff / student / service provider.

Your data is securely stored on an access control server and is password protected. The access control system sits on the university network, and is physically separated from regular, day-to-day data to preserve integrity of data and its privacy. For offline doors which are not connected to the university network, data is held on these doors in an encrypted manner for a maximum of 1,020 uses of that door by a user with their Ucard. We fully respect your right to privacy and treat all personal information with the appropriate standards of security and confidentiality, strictly in accordance with the GDPR.

# Who has access to the information and who we share it with?

The personal data collected from you will be accessed by Estate Services, the Safety Insurance Operational Risk and Compliance (SIRC) Office or other UCD units, strictly only where required in the fulfilment of their function.

Third party service providers in their function as a contracted service to UCD will have access to the data for the viewing of

CCTV data and maintenance of the CCTV system.

Third party service providers in their function as a contracted service to UCD will have access to the data for day-to-day administrative duties for the access control system that support UCD operations

We will share the data collected with or supplied to An Garda Siochána (or other law enforcement body) when required.

# What are your rights?

- The right to access You have the right to request access to your information/personal data.
- The right to rectification You have the right to request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- The right to erasure You have the right to request that we erase your personal information/data, unless UCD is obliged to retain your information/data for one of the purposes listed above.
- The right to restrict processing You have the right to request that we restrict the processing of your personal data.
- The right to object to processing You have the right to object to processing of your personal data but this right may be restricted under certain circumstances.

If you wish to exercise any of your rights listed above, you can do so by contacting the UCD Estates Services using the contact information listed at the start of this Privacy Notice.

If you have concerns about your rights as a participant, you can contact the UCD DPO by email gdpr@ucd.ie.

If you are not satisfied with UCD's response or believe we are not processing your personal data in accordance with the law, you can complain to the Irish Data Protection Commission. For more detail see: <a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a>

You can access UCD's Privacy Notices at <a href="https://www.ucd.ie/privacy/">https://www.ucd.ie/privacy/</a>. This specific privacy notice is to provide you with further information on the access control system used by UCD Estate Services.