

# UCD Privacy Statement for Exchange Applicants & Prospective Exchange Applicants

### 1. Purpose of this statement

This privacy statement explains how and why University College Dublin (UCD) processes your personal data for exchange application and nomination purposes. This privacy statement is not intended to cover all personal data processing at UCD and data processing activities may be dealt with under separate privacy statements.

University College Dublin ("UCD") is committed to protecting the privacy and security of personal data. Throughout this statement, "University", "we", "our", and "us" refer to UCD; "you" and "your" refer to those whose data we process because they are or were applicants to the University.

UCD collects, uses and is responsible for certain personal data. This is known as "processing". When we do so we are regulated under data protection legislation and we are responsible as the "data controller" of that personal data for the purposes of those laws.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). Under data protection legislation, there is also 'special category' personal data, which is more sensitive personal data. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

## 2. Legal Basis

UCD is a statutory authority under the Universities Act, 1997. Data processing carried out by UCD is generally undertaken in fulfilment of its statutory objects, functions and duties under sections 12 and 13 of the Universities Act.

# 3. Information we hold about you

Exchange applicant personal data are normally gathered by the University directly via the UCD Exchange Application System.

The types of applicant personal data processed by UCD include but are not limited to:

- Student ID number
- Gender
- Unique Personal Identifiers and Biographical Information, such as Student Number, Name, Title, Date of Birth and Citizenship
- Email address(es)

- Details of Students' Education (including your college(s), the courses you have completed, your subjects, dates of study, your Transcript of records)
- Academic history
- Details of what correspondence we have sent to you
- Information about parties who are providing funding, including names and financial information to allow us to contact them and process payments
- If applicable, information about financial grants you may receive during your exchange to allow us to process payments

In addition to application to an exchange programme in UCD, data may also pertain to applications for supports (e.g. financial, access, etc.). The University may in some cases process special category data for example, health data, where relevant to applications for support. We will normally process special category data on the basis of your consent and you may withdraw your consent at any time by contacting us using the information provided at the end of this statement. However, withdrawal of consent may affect your eligibility. Withdrawal of consent will not impact on the legitimacy of our processing of such data during the period we had your valid consent.

# 4. How we obtain your information

Students' personal data are normally gathered by the University:

- a) Via the admissions processes including:
- Information you provide to UCD during registration such as any applications you complete
- Any other admission procedures operated by UCD
- Information you provided through a specified application process route, such as the Exchange Application
- b) Through communication between you and UCD by telephone, email, or via the website.
  - For example, when you call to make enquiries about a course or when you are raising concerns or queries.
- c) We may also obtain your personal data from third parties, for example: Information from your sponsor/grant awarding body (e.g. Student Universal Support Ireland (SUSI)).

#### 5. How and why we use your personal data

# **Main Purpose of Data Processing**

UCD needs to collect, maintain and use information to administer your exchange application and nomination, provide you with support, advise you of relevant events and scholarships and for strategic planning.

This data enables UCD to deliver our services in an efficient manner, to ensure each exchange applicant receives relevant information and to enable us to use resources in the most effective way.

We share this data within the University in order to deliver a high standard of service to you, so it is your responsibility to provide us with correct and up to date information about you in your exchange application. For successful applicants, the information collected in the exchange application forms will be shared with the relevant Partner University once you have accepted your exchange offer.

Data processing and sharing is undertaken for the purpose of assessing the exchange application to study at one of UCD's partner universities in an efficient and fair manner. Data processing and sharing of personal data will be undertaken by UCD for purposes directly related to assessing and administering the exchange application and with the relevant partner university only.

# Transferring your information outside of Europe

For those students who are involved with one of our overseas partners, who are based outside of the European Economic Area ("EEA"), some of your information will be transferred to those other locations. Where personal data are transferred to countries outside the EEA, you should be aware that these countries may not have similar data protection laws to the EU and Ireland.

If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security and privacy measures are taken with the aim of making sure that your privacy rights continue to be protected as outlined in this statement.

### Other Purposes of Data Processing

UCD will, as appropriate, directly provide you, the data subject, with information regarding UCD's partner university and your exchange application. UCD also uses application data for business intelligence and statistical analysis at an aggregate level where the confidentiality of personal data will be maintained. Where we have your permission, data will be shared with students going to the same region, and future students going to the same region.

The personal data will not be used for any other purpose other than the main purpose and those purposes listed above.

## 6. Retention

Applicant personal data are held in student administrative systems such as Banner, InfoHub and by UCD Registry, Colleges and Schools, and other support services in network storage and paper files. Your personal data will be retained in line with the University's Record Management and Financial Retention Policies and the Higher Education Authority/European Commission rules.

# 7. Your rights

You have a number of rights regarding access to and control of your personal data, including:

- **Right of Access**: You have the right to know what type of personal data UCD holds about you and to obtain a copy of this data.
- Right of Erasure: Under certain circumstances, GDPR allows you to have personal data erased. We will assess whether it is possible to implement such a request but please be aware that UCD will need to retain certain information about you in order to carry out our lawful functions.

- **Right to Object:** Under certain circumstances, you can object to the processing of your personal data.
- **Right to Portability**: Under certain circumstances, you have the right to request that we provide elements of your data in a commonly used, machine-readable format.
- **Right to Rectification:** You have the right to have any inaccurate personal data which we hold about you updated or corrected.
- **Right to Restriction:** You have the right to block the processing of your personal data in certain circumstances. We will assess whether it is possible to implement such a request.
- Automated Decision-Making: You have the right to object to automated individual
  decision-making (i.e. making a decision solely by automated means without any
  human involvement) and profiling (i.e. automated processing of personal data to
  evaluate certain things about an individual). However, UCD does not make any
  decisions about students using wholly automated means.

If you wish to make a request under any of the above, please contact exchanges@ucd.ie.

## 8. Changes to this Statement

We regularly review our privacy information to ensure that it remains accurate and current. We will include the effective date on each version of this statement that we issue.

This statement was last updated on 17.11.2020.

## 9. Queries or Complaints

If you have any questions about this statement, please contact exchanges@ucd.ie.

If you are not satisfied with the response you get from UCD Global - Exchanges or wish to lodge a complaint about the way in which UCD processes your personal data, please contact our Data Protection Officer at <a href="https://www.ucd.ie/gdpr/contact/">www.ucd.ie/gdpr/contact/</a>.

You also have the right to lodge a complaint with the Data Protection Commission, Ireland's supervisory authority for data protection. Details of how to lodge a complaint can be found on the Data Protection Commission's website.