

UCD RETURN TO WORK SAFELY PRIVACY NOTICE
UCD Safety, Insurance, Operational Risk and Compliance (SIRC) Office
Contact: www.ucd.ie/sirc/ Email: sirc@ucd.ie

PURPOSE

This Privacy Notice covers the data processing for UCD to meet its obligations under the Covid-19, 'National Return to Work Safely Protocol' to ensure that UCD is a safe place to work.

INFORMATION COLLECTED AND PROCESSED

The University is cross-referencing three separate datasets: Return to Work Approvals Dataset, Campus Workplace Attendance Dataset, and Building Access dataset; to confirm that staff who are working on campus, have been approved to Return to Work and are recording their presence in accordance with the University's Return To Campus Working Protocol. This combined dataset is defined in this Privacy Notice as the UCD 'Return to Work Safely' dataset.

The information held on you for this specific data processing activity includes any of the following

DATA COLLECTION

- a) Return to Work Safely approvals information, which you submit when you apply for approval to return to work in UCD on Infohub.
- b) Workplace attendance online data, which you submit via Google forms when you are recording your presence on campus
- c) Swipecard / Fob Building Access Data, which you submit, when you swipe your card / fob to access a building.

DATA PROCESSING

The University will review the dataset at the aggregate level by Unit, building and campus, to ensure the campus is a safe place under the National Return to Work Safely Protocol. The University may review the dataset to contact individual staff members, where it is necessary to investigate a possible outbreak of Covid-19 on campus, and to share necessary information with the Covid-19 National Contact Tracing Service.

HOW WE OBTAIN YOUR INFORMATION

All the information is supplied by you on Infohub, via an online Google form, or through the use of your Swipecard / fob for building access.

LEGAL BASIS

The legal basis for processing this dataset is the 'Legitimate Interest' of UCD, to meet statutory obligations under the National Return to Work Safely Protocol.

SPECIAL CATEGORY DATA

As part of the UCD Return to Work Process, staff are required to confirm that they do not have symptoms of Covid-19, to be approved to work on campus. UCD is collecting this special category health data in the 'Public interest in the area of public health', to help combat Covid-19 and to comply with the provisions of the Government's Return To Work Safety Protocol.

SHARING PERSONAL DATA

The dataset will be stored in UCD, for internal use. UCD will share the 'Return to Work Safely' dataset with external organisations where it is necessary to fulfil legal obligations under the National Return to Work Safely Protocol, to facilitate contact tracing in the event of a Covid 19 case within the University.

KEEPING YOUR INFORMATION SAFE

UCD has put in place effective security protocols to protect this dataset. Security protocols are in place to protect the online data, while the building access data is secured. Access to the dataset will be restricted only to a limited number of staff members, on a need to know basis.

DATA RETENTION

This dataset will be retained by UCD for the following periods of time:

Online Approvals Data: UCD will retain this data until the new permissions process is discontinued in the University and there is no requirement to keep a record of approvals to work on campus under the Protocol.

Workplace Attendance Data, online: Log in and out data through Estate Services: 28 day retention period. This period allows for the development of a Covid-19 infection and the related contact tracing by the HSE.

Swipecard / Fob Usage: Building Data access, Log in and out swipe card data: 60-day retention period.

YOUR RIGHTS, QUERIES OR COMPLAINTS

Information on data privacy and your data protection rights in UCD is available on the UCD [GDPR web page](#)

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If you have any questions about this Privacy Notice or wish to lodge a complaint about how UCD processes your personal data, please contact our Data Protection Officer (DPO), Dr Ulrike Kolch at gdpr@ucd.ie

You also have the right to lodge a complaint at any time with the Data Protection Commission, Ireland's supervisory authority for data protection, but we do ask that you come to us first and give us the opportunity to address your concerns wherever we can. Details of how to lodge a complaint can be found on the [Data Protection Commission's website](#).