UCD Workvivo privacy statement

This document is for informational purposes only and does not constitute legal advice.

Introduction

UCD 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 processed by the University will be treated in accordance with the relevant data protection legislation.

This statement relates to the University College Dublin (UCD) Employee Engagement & Internal Communications Service - UCD Workvivo (the service) which is developed, hosted and supported by Workvivo. This service forms part of how UCD supports employee engagement, awareness and collaboration across the University. The relationship between UCD and Workvivo is a contractual one, which includes special considerations in terms of data protection.

What is the Service?

UCD Workvivo, powered by Workvivo is an employee engagement platform that connects the employees in University College Dublin to the organisation, its goals and each other. It is a single, branded gateway that connects users to 'all things UCD' and is available on computer and mobile devices. The platform is designed for internal communications between employees and for the University to communicate directly to employees.

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

All relevant employees **will be provisioned from the HR management system** using the following data: *name, email address, school/unit, role, UCD phone number, reports-to (manager), known-as (if relevant),* and will be entitled to use the service, although there is no obligation to do so. This provisioning into the service will happen automatically when an employee joins. The employee will be deprovisioned from the service when they leave the University. The data is kept for the duration of employment at UCD.

Legal Basis

The legal basis for processing your personal data to automatically set you up in Workvivo is 'legitimate interest', more specifically for connecting the University and its users to 'all things UCD'. This processing is necessary in order to ensure all qualifying employees have single sign-on and secure access to the service and are correctly assigned to the correct community spaces in UCD Workvivo. Should you decide to become an active user of and contributor to Wirkvivo, this will be done on the basis of your consent.

Who has access to the information and with whom do we share it?

External access: The University will share the data (as listed above) with Workvivo, for purposes of the processing to provide the service to University employees. The processing of this data will take place within the EEA.

Collection and use of personal information

Some data, including personal data, is processed for operational purposes and to manage the service. Information on Workvivo activity is collected routinely by UCD and by its service provider, Workvivo, in order to provide the employee engagement and collaboration service. Workvivo does not collect, use or disclose personal information except to carry out its obligations to UCD.

As a service, the Workvivo platform allows employees to post information to specific groups called *Spaces*. Most of the posts will be within School and Unit spaces. In specific cases and for specified units, information can be posted more generally. There are procedures around this and this element of the service is strictly limited.

When a person posts, likes or comments, their name is posted beside the item. The only element where an employee interacts anonymously with the service is through the participation in pools/surveys.

At any stage an employee may return to a post they made and delete it if they wish, including prior to leaving the University.

When an employee leaves the University, their access to their UCD Workvivo account will be removed. Any prior posts, content published and/or uploaded to the UCD Workvivo platform which an employee has made during their employment with UCD will be retained on the UCD Workvivo service platform but under the name 'previous colleague'.

Should a person leaving UCD not want to have one of their posts retained long term as 'previous colleague', they can either delete the post prior to leaving UCD, or if their personal data is contained in the post and they have left already, they need to contact the Workvivo administrator at <u>workvivo@ucd.ie</u> to do so on their behalf.

Posting on UCD Workvivo

Upon signing in to the service for the first time, employees will be asked to agree to use Workvivo and associated services in accordance with the <u>UCD Acceptable Use Policy</u> and follow the UCD <u>code of practice</u> at all times when interacting with the service.

Employees should not post personal or sensitive information to any part of UCD Workvivo or add links to inappropriate or unsuitable content. In particular sensitive documents should not be shared via the service as downloadable documents. Secure documents should be stored and shared using Google Drive.

UCD reserves the right to monitor user activity in Workvivo, and where necessary to take appropriate action. UCD is not responsible for the content of any websites linked from Workvivo, or for personal information disclosed by individuals themselves. UCD may also collect anonymised data on Workvivo usage for statistical purposes, planning for service improvements or administrative functions. In exceptional cases permitted by data protection laws, UCD may disclose data without user consent or notice, for example, if it is required to investigate offences, to prevent injury or damage or to comply with a legal obligation.

When uploading photographs or videos featuring other identifiable people, the employee should ensure that those featured in the imagery were aware that it could be published to UCD internal platforms (and external if appropriate) and were given with details of how to opt out of inclusion, through the provision of contact details etc.

All employees have access to a 'Report a Post' function - at the top right-hand corner of each post (shown as '...'). The moderator for that area of content will be alerted and will make a judgement call, based on UCD policies or the purpose of the platform, on whether or not the post needs to be removed. The Moderator's decision is final.

Cookies

Cookies are small pieces of data placed on your web browser by the web sites you visit. Their use within the EU is governed by the Cookies Directive - Directive 2009/136/EC, which amends Directive 2002/58/EC. It provides that "the storing of information or the gaining of access to information already stored, in the terminal equipment of a subscriber or user is only allowed on condition that the subscriber or user concerned has given his or her consent, having been provided with clear and comprehensive information". Certain cookies are essential to the proper functioning of UCD systems, for example, cookies enable UCD users to access UCD Workvivo through single sign on (SSO) using their UCD Connect ID. The use of these functional cookies does not require consent, as they are necessary for the delivery and security of the service. The use of cookies on UCD systems is described in detail on the UCD cookies page.

Data Retention

The University will retain your personal data in UCD Workvivo for as long as you are a member of the eligible employee cohort.

Your Rights Pursuant to the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) you have the following rights:

- Right to access
- Right to rectification
- Right to erasure if data is incorrect or no longer needed
- Right to data portability

Some of these rights are not absolute rights and do not apply in all situations. If you want to make use of your rights, please contact the Workvivo administrator at **workvivo@ucd.ie**.

If you have concerns about your rights as a UCD Workvivo user, 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 have the right to complain to the Irish Data Protection Commission. For more detail see https://www.dataprotection.ie This statement should not be construed as a contractual undertaking.

Workvivo Privacy policy.