



Maynooth University
Data Protection Office

Student Data Privacy Notice

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1. Introduction

This privacy notice explains how Maynooth University collects, processes and shares student personal data, and your rights in relation to the personal data held.

Maynooth University is the data controller of your personal data and is subject to the Data Protection Acts 1988 to 2018 ("DPA") and the General Data Protection Regulation (the "GDPR").

The General Data Protection Regulation (the "GDPR") and the Data Protection Acts 1988 to 2018 (together "**Data Protection Law**") confer rights on individuals regarding their personal data as well as responsibilities on persons processing personal data, in this case the University.

For further information on the University's obligations under Data Protection Law and the steps taken to ensure compliance with those obligations, see the *Maynooth University Data Protection Policy*, available here: <https://www.maynoothuniversity.ie/data-protection/policies-privacy-notice>

2. Purpose

This privacy notice outlines the policy of Maynooth University (the "University") concerning the Personal Data (as defined below) it collects and processes in relation to students. This notice applies to those engaged in processing Personal Data relating to students for administrative, research or any other purposes, including: -

- Persons employed by or engaged by the University in such a role;
- Contractors and agents engaged by and acting on behalf of the University in such a role;
- Students of the University (which in this context includes student applicants, existing students and former students).

3. Principles of the Data Protection Acts

Maynooth University will comply with its responsibilities under the legislation in accordance with the data protection principles outlined in the Acts as follows:

- (a) Personal data shall be processed lawfully, fairly and in a transparent manner;
- (b) Personal data shall be collected for one or more specified, explicit and legitimate purposes and shall not be processed in a manner that is incompatible with such purposes;
- (c) Personal data shall be adequate, relevant and not excessive in relation to the purposes for which they are processed;
- (d) Personal data shall be accurate, and, where necessary, kept up to date, and every reasonable step shall be taken to ensure that data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- (e) Personal data shall be kept in a form that permits the identification of a data subject for no longer than is necessary for the purposes for which the data are processed;
Maynooth University's records retention schedules can be viewed at:
<https://www.maynoothuniversity.ie/data-protection/personal-data-retention-schedules>
- (f) Personal data shall be processed in a manner that ensures appropriate security of the data, including, by the implementation of appropriate technical or organisational measures, protection against
 - (i) Unauthorised or unlawful processing, and
 - (ii) Accidental loss, destruction or damage.

Maynooth University has procedures in place to ensure that data subjects can exercise their rights under the Data Protection Law.

4. Definitions

Personal data means information relating to: -

- (a) An identified living individual, or
- (b) A living individual who can be identified from the data, directly or indirectly, in particular by reference to:
 - (i) An identifier such as a name, an identification number, location data or an online identifier, or
 - (ii) One or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual;

Special categories of personal data means: -

- (a) Personal data revealing
 - a. The racial or ethnic origin of the data subject,
 - b. The political opinions or the religious or philosophical beliefs of the data subject, or
 - c. Whether the data subject is a member of a trade union,
- (b) Genetic data,
- (c) Biometric data for the purposes of uniquely identifying an individual,
- (d) Data concerning health, or
- (e) Personal data concerning an individual's sex life or sexual orientation.

5. Collection of Student Personal Data.

The University collects student personal data in a number of ways:

- Directly from you – such as information you provide when you interact with the University before joining, (e.g. when you express an interest in studying at Maynooth University), information provided when you apply to study at Maynooth University and complete enrolment forms via CAO, PAC, CRM and online or hard copy applications, information provided when you communicate with the University by telephone, email or via our website to make enquiries or raise concerns and in various other ways as you interact with the University during your time as a student;
- From third parties - such as from other Higher Educational Institutions or employers who may provide a reference about you or who may sponsor your studies;
- Other ways – such as through the use of CCTV on the campus.

6. Categories of Student Personal Data Collected

Student personal data collected includes:

- Student Number,
- PPS No,
- Name,
- Phone number(s)
- Date of Birth,
- Country of Birth
- Nationality
- Gender
- Addresses (Home, Term, personal and work email)
- Parent and/or Next of kin telephone,
- Personal email contact details and addresses
- Financial Data
- Image (for Identity card)
- Visa requirements/visas

- ID (Passport/Driving Licence)
- Details of previous results
- Schools attended
- Course Application Details
- Socio-Economic Category (optional)
- Details of Fees
- Student Course Code
- Assessment Results
- Degrees/Diplomas awarded
- Curricula Vitae
- Parents Socio Economic grouping (optional)
- Parents Occupation (Optional)
- Parents Employment Status (Optional)
- Details of Disabilities (Optional)
- Medical Records
- Records of visits to Counselling Service
- Garda Vetting forms (for specific courses involving contact with minors)
- CCTV

Special categories of personal data, such as medical information and criminal convictions and offences are collected/maintained by a limited number of offices and are not shared across the University. These details are disclosed either in line with the legal requirements on the University (e.g. Garda Vetting forms are sent to the Student Vetting Office to facilitate vetting of students) or upon the furnishing by the student of their written consent to a disclosure

7. Purposes and legal bases for processing

The University processes personal data relating to students for purposes associated with the administration of the student/University relationship and to fulfil contractual and educational obligations. The purposes for which student personal data processed during a student's association with the University include:

- Administrative purposes including the facilitating of classes, examinations and graduation.
- Maintenance of student records.
- Administering finance (e.g. grants, bursaries and any other benefits).
- Providing support services.
- Providing library, IT and information services.
- Providing operational information.
- Promoting our services and other operational reasons.
- Safeguarding and promoting the welfare of students.
- Ensuring the safety and security of students.
- Facilitating future contact with you following graduation.
- Carrying out audits.

In addition, the University needs to communicate with students from time to time in relation to administrative, academic and other matters. The University strives to use the most effective and efficient communication methods when communicating with students. The University provides all registered students with a '@mumail.ie' email address to facilitate email communications to/from students and staff. The University utilises a variety of methods/technologies to communicate with students based on any the following data:

- Student's University email address.
- Student's mobile phone number.
- Student's home phone number.
- Student's term address.
- Student's home/other address.
- Student's personal email address.

In exceptional circumstances, where urgent communication with a student through direct contact details is not possible or has, following repeated attempts, been unsuccessful, contact may be made via a student's parents, partner, next of kin or external funder (as appropriate) using the details furnished by the student. Relevant exceptional circumstances in this regard may include accidents/emergencies and matters of security.

The legal bases on which the University processes student personal data are:

- That this is necessary for the performance of tasks that we carry out in the public interest or in the exercise of official authority vested in us by law, in particular the requirement to provide courses of study, conduct examinations and award degrees and other qualifications pursuant to section 13(1)(a) of the Universities Act 1997; or
- That this is necessary for compliance with a legal obligation that applies to us (for example sharing information with statutory bodies like the Higher Education Authority, performing audits, preventing and detecting a crime etc); or
- That this is necessary for the performance of a contract that is entered into with you or in order to take steps at your request prior to entering into such a contract; or
- To protect the vital interests of you or another person (for example, providing medical or emergency contact information to third parties/emergency services personnel, contacting next of kin in the case of an emergency etc); or
- With your express consent.

8. Recipients of Student Personal Data

Personal data may be disclosed internally when passed from one department to another in accordance with the data protection principles and this notice. Personal data is not passed to any internal department or any individual that does not reasonably require access to that personal data with respect to the purpose(s) for which it was collected and is being processed.

The University may disclose your personal data to other organisations in connection with the above purposes, including (please note this list is not exhaustive):

- To funding bodies and agencies that support or sponsor student education.
- To professional, educational or similar institutions that you have approached.
- To third party service providers.
- To the public at large, for example in the course of conferring ceremonies where student graduate status or another award is publicly acknowledged.
- To the Maynooth University Foundation and Maynooth University and St Patrick's College Alumni Association to facilitate future contact between students, the National University of Ireland Maynooth and fellow alumni.
- To internal and external auditors.
- To other public authorities and bodies where required or permitted by law, such as the Higher Education Authority, the National University of Ireland, Department of Further and Higher Education, Research, Innovation and Science, Department of Employment Affairs and Social Protection, or in the case of the Gardaí or other law enforcement authorities where necessary for the purposes of the prevention, investigation or detection of crime.

Please note, your personal data is shared with the Alumni office as you provide consent during registration. If you would like to withdraw consent for the Alumni office to contact you after your graduation, you may email them directly at: alumni@mu.ie

9. Retention

The University will not hold your personal data for longer than is necessary. The University retains your personal data for as long as necessary for the purposes described in this notice and to comply with our obligations under applicable law.

10. Data Subject (Students) Rights

As a student in respect of whom the University holds personal data, you have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- The right to access the personal data that we hold about you.
- The right to request the rectification of the personal data we hold about you in certain circumstances.
- The right to restrict the use of the personal data we hold about you in certain circumstances.
- The right to have personal data erased (where appropriate).
- The right to object to the processing of the personal data we hold about you in certain circumstances.
- The right to data portability regarding certain automated personal data.
- In relation to the rights within Data Protection Law relating to “automated decision-making”, the University does not use such processes and they do not arise.
- The right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require the University to transmit that data to another controller in certain circumstances.
- The right to withdraw your consent at any time, where the University’s processing of your personal data is based on you having provided consent.

Students can apply to exercise their rights by contacting the University’s Data Protection Officer.

11. Responsibilities

- Maynooth University has overall responsibility for ensuring compliance with the Data Protection legislation.
- All employees and students of the University who collect and/or control the contents and use of personal data are also responsible for compliance with the Data Protection legislation.
- Students and Staff must report any personal data security breaches to the Data Protection Office immediately. Contact: dataprotection@mu.ie
- The Data Protection Office will assist the University and its staff in complying with the Data Protection legislation by providing and facilitating, support, assistance, advice and training.

12. CCTV

CCTV cameras are in operation at a range of points across the University campus and the primary purpose of having CCTV is for security and health & safety purposes. As an ancillary use, student monitoring will only take place in the event of an incident that requires investigation. Access to the recorded material is strictly limited to authorised personnel. Please refer to the University’s CCTV policy for more information, available here: <https://www.maynoothuniversity.ie/university-policies/data-and-privacy>

13. Transfer of Data Outside of Europe

There is an obligation on all countries in the European Economic Area (EEA) to have a similar standard of protection of personal data. In the event that the University would be required to transfer data outside the EEA, before doing so, steps would be taken to ensure that there is adequate protection as required by the Legislation. Please refer to the University’s Data Protection Policy for more information on

requirements for transfers outside of the EEA, available here: <https://www.maynoothuniversity.ie/data-protection/policies-privacy-notice>

14. Contact

Contact us

If you wish to make an access request

Or exercise your rights as outlined under data protection law

Or

have any queries about this privacy notice please contact the University's Data Protection Officer:

E-mail: dataprotection@mu.ie

Telephone: +353 1 708 6184 / 3654

Postal Address:

Data Protection Officer,
Rooms 17/27,
Rye Hall Extension,
Maynooth University,
Maynooth,
County Kildare.

Further information is available on the University web:

<https://www.maynoothuniversity.ie/data-protection>

Data Controller

Maynooth University
Maynooth
County Kildare
Ireland

W: www.maynoothuniversity.ie

15. Complaints

If you are dissatisfied with the decision of the Data Protection Officer, you have the right to make a complaint to the Data Protection Commission.

Phone 01 7650100 / 1800 437 737

E-mail info@dataprotection.ie

Postal Address Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

16. Updates

Maynooth University may occasionally update this policy. We encourage you to periodically review this policy for the latest information on our privacy practices. We also encourage you to advise us of any changes to your personal data which we hold so that we can ensure that your personal data is accurate and up to date.

17. General

All Data Protection issues should be addressed to the:

Data Protection Officer

dataprotection@mu.ie

Tel +353 1 708 6184 / 3654

Controller

Maynooth University

Maynooth

County Kildare

Ireland

W: www.maynoothuniversity.ie

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T +353 1 708 6184 / 3654 E dataprotection@mu.ie W [maynoothuniversity.ie](http://www.maynoothuniversity.ie)