



**Maynooth
University**
National University
of Ireland Maynooth

Maynooth University

Inventory of Personal Data Category Usage

Data Protection Office
5-18-2018

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Introduction

The Inventory of Personal Data Category Usage explains how Maynooth University uses personal data relating to data subjects. The purpose of the inventory is to identify the usages associated to personal data categories and special categories of data that are accessed and stored through the university. This data has been collated from the Personal Data Security Schedule forms returned to the Data Protection office from the departments and offices throughout the University.

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. The details of Principles and Definitions are available in [appendix 1](#).

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 website](#).

Personal Data Security Schedule (PDSS)

The PDSS form is designed to identify what personal data and special categories of personal data are processed throughout the University and for what purpose. The form identifies the processes used in offices and departments for the security, retention and destruction of data that is in use. It identifies who can amend data and who can access data. As not all data is held on centrally maintained systems the PDSS returns facilitates the building of an inventory to ensure full compliance. The form was distributed to and completed by offices and departments within the University. For access to a PDSS return please contact the Data Protection Officer.

The information requested is as follows:

	Header
1	Personal Data - Type, category or description
2	Data format -Electronic / Paper / Both
3	Reason / purpose for holding onto the data
4	Responsibility for security of the data is assigned to
5	Who may access the data
6	Who may amend the data
7	To whom only may the data be provided or shared
8	Security controls in place over the data
9	How long is the data to be held?
10	Responsibility for deleting the data is assigned to
11	Method of disposal of the data
12	Any other comments

The PDSS is available in [appendix 2](#)

Personal Data - Type, category or description

The categories of personal data identified as being processed in the University are as follows:

Personal Data Category	Non-Research	Research
Name	Y	Y
ID/PPSN/Student Number/Staff Number	Y	Y
Date of Birth	Y	Y
Personal email	Y	Y
Home address	Y	Y
Personal contact number	Y	Y
Image	Y	Y
Medical	Y	Y
Financial records e.g. Bank account details	Y	Y
Cultural	Y	Y
Racial	Y	Y
Ethnic	Y	Y
Political	N	Y
Genetic	N	Y
Biometric	N	Y
Sexual life	Y	Y
Religion	Y	Y
Offence (including alleged offences)	Y	Y
Criminal Proceedings, outcomes and sentences	Y	Y
Trade union affiliation	N	N

Reason / purpose for retaining the data

Findings from the analysis of the “Reason / purpose for retaining the data” the usage of the identified data categories currently includes but is not limited to the following:

Data Category Usage		
Absence management	Event management	Provision on service
Academic appointments	Exam appeals	Reconciliation
Academic assessment	Exam assessment	References
Academic exceptions	Examination	Registration
Additional supports	Fee management	Regulatory requirements
Administration	Financial	Research
Advisory	Financial budgeting	Scholarships
Annual reviews	Funding	Staff emergency contact numbers
Appeals	Health and Safety	Staff management
Academic applicants	Historical tracking	Staff statistics
Attendance records	Insurance	Statistical
Auditing	Intellectual property	Statistics and Returns
Business incubator	Interviews	Statutory requirement
Capacity planning	Invention disclosures	Stipends

Class lists	IT Support	Student Elections
Communication	Legal	Study abroad
Conferring	Medical	Summer school
Correspondence	Module Co-ordination	Temporary staff opportunities
courses assessment	Monitoring	Training
Degree parchments	Office administration	Trending
Department admin	Payment appeals	Vacancies
Emergency contact details	Payroll	Vendor management
Employment	Pension	Vetting
Employment applicants	Placements	Virtual learning environment
evaluation	Progression	

Data format

Personal data and special categories of personal data is collected, processed and stored both electronically and manually.

Data Distribution

There are two types of recipients of personal data:

1. Internal community e.g. staff
2. External community e.g. Higher Education Authority, Garda Vetting.

The distribution and sharing of data with the internal University community is to comply with the purpose of the Register of Data Processing Activities.

The purpose of sharing information with the external community is to fulfil legal and contractual obligations.

The University may disclose personal data to other organisations in connection with the above purposes, including:

No.	Recipient Type	Can Amend	Reason
1	Internal	Y	Administration of staff and students for fulfilment of contractual obligations
2	Internal & External	N	To agents and contractors of the University where there is a legitimate reason for their receiving the information (including service providers, insurers and external legal and financial advisers).
3	Internal & External	N	To potential employers of Staff members (to provide references).
4	External	N	To professional and regulatory bodies.
5	Internal & External	N	To other higher education providers or employers where the Staff member is taking part in an exchange programme or other collaboration as part of their engagement by the University.
6	External	N	To funding bodies and agencies that support or sponsor student education.

7	External	N	To professional, educational or similar institutions that you have approached.
8	External	N	To third party service providers.
9	External	N	To the public at large, for example in the course of conferring ceremonies where student graduate status or another award is publicly acknowledged.
10	External	N	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.
11	Internal & External	N	To internal and external auditors.
12	External	N	To other public authorities and bodies where required or permitted by law, such as the Higher Education Authority, Department of Education and Skills, 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.

Retention Security & Disposal

Maynooth University will not hold your personal data for longer than is necessary. The University retains your personal data for as long as it is necessary for the purposes described in this Notice, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between you and the University. The University retention and disposal policies are available at [University Records Retention Schedule](#)

Appendix 1

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 and fairly;
- (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 records retention schedule can be viewed at [University Records Retention Schedule](#)
- (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.
 - (ii) Accidental loss, destruction or damage.

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

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
 - (i) the racial or ethnic origin of the data subject,

- (ii) the political opinions or the religious or philosophical beliefs of the data subject, or
 - (iii) 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.

Appendix 2

PDSS

Personal Data - Security Schedule

DEPARTMENT/OFFICE/UNIT

Purpose: To document all the types of personal data held and/or processed and the security measures applied to the data

Prepared by:

Ref	Personal Data - Type, category or description	Data format - Electronic / Paper / Both	Reason / purpose for holding onto the data	Responsibility for security of the data is assigned to	Who may access the data	Who may amend the data	To whom only may the data be provided or shared	Security controls in place over the data	How long is the data to be held?	Responsibility for deleting the data is assigned to	Method of disposal of the data	Any other comments
1												
2												
3												
4												

Personal Data Security Schedule	
Enter Unit Name Here	
Approved by:	Date

