



**Maynooth
University**
National University
of Ireland Maynooth

Maynooth University

Register of Personal Data Processing Activities

Data Protection Office
5-14-2018

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Works Cited

Oireachtas. (2018, May 14). *Oireachtas*. Retrieved from Oireachtas:
https://data.oireachtas.ie/ie/oireachtas/bill/2018/10/eng/ver_c/b10c18s.pdf

Introduction

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 Principals and Definitions are available in appendix 1. Specific to section 80 Record of data processing activities: "A controller shall create and maintain in writing information in relation to each category of processing activity for which it is responsible" (Oireachtas, 2018)

The purpose of the register is to identify the personal data categories and special categories of data that are collected, accessed and stored throughout the university. This data has been collated from the Personal Data Processing forms returned to the Data Protection office from the departments and offices throughout 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 website](#).

Identity and Contact

Identity	Contact
Data Controller:	National University of Ireland, Maynooth University Maynooth County Kildare Ireland Web: www.maynoothuniversity.ie
Data Protection Officer	Ann McKeon, E-mail: ann.mckeon@mu.ie Telephone: +353 1 7086184 Postal Address: Data Protection Officer, Maynooth University, Room 17, Humanity House Maynooth County Kildare.

Purpose

The National University of Ireland Maynooth is a constituent University of the National University of Ireland. The University is responsible for the provision and administration of undergraduate and postgraduate education; conducting and publishing academic research. The University processes personal data relating to employees for purposes associated with the administration of the employer/employee relationship (or similar) and to fulfil legal contractual obligations. 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.

Categories of Personal Data Concerned

The categories of personal data concerned for academic and administrative functional areas are as follows:

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

The categories of personal data concerned for Research areas are as follows:

Personal Data Category	Stored(Y/N)
Name	Y
ID/PPSN/Student Number/Employee Number	Y
Date of Birth	Y
Personal email	Y
Home address	Y
Personal contact number	Y
Image	Y

Medical	Y
Financial records e.g. Bank account details	Y
Cultural	Y
Racial	Y
Ethnic	Y
Political	Y
Genetic	Y
Biometric	N
Sexual life	Y
Religion	Y
Offence (including alleged offences)	Y
Criminal Proceedings, outcomes and sentences	Y
Trade union affiliation	N

Categories of Data Subjects

The categories of data subjects to which personal data relate are:

- (i) Employees.
- (ii) Students.
- (iii) Applicants.
- (iv) External agents.

Categories of Recipients

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

No.	Reason
1	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).
2	To potential employers of employees (to provide references).
3	To professional and regulatory bodies.
4	To other higher education providers or employers where the employee is taking part in an exchange programme or other collaboration as part of their engagement by the University.
5	To funding bodies and agencies that support or sponsor student education.
6	To professional, educational or similar institutions that you have approached.
7	To third party service providers.
8	To the public at large, for example in the course of conferring ceremonies where student graduate status or another award is publicly acknowledged.
9	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.

10	To internal and external auditors.
11	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.

Categories of Transfer

Currently there are no categories of transfer of personal data to a third country or an international organisation.

Legal Basis

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

1. 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.
2. That this is necessary for compliance with a legal obligation that applies to us.
3. 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

Retention

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 policies are available at [University Records Retention Schedule](#)

Profiling

Currently there is no processing undertaken in Maynooth University that uses personal data for the purpose of profiling.

Security

Maynooth University implements appropriate technical and organisational measures to guard against theft, malicious damage or corruption (including computer viruses), unlawful access, accidental disclosure, loss and destruction and to ensure a level of security appropriate to the risks to personal data that may arise in connection with the processing activities the University undertakes. Such measures include but are not limited to:

Record Type	Security
Electronic Personal Data	Encrypted storage
	Access controls
	Secured storage
Manual Personal Data	Access Controls
	Secured Storage

Responsibilities

Maynooth University has overall responsibility for ensuring compliance with Data Protection law. All employees of the University who collect and/or control the contents and use of personal data are also responsible for compliance with the Data Protection Law. Employees must report any personal data security incidents directly to the Data Protection Officer. The Data Protection Officer will assist the University and its employees in complying with Data Protection law by providing and facilitating, support, assistance, advice and training.

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

Personal Data Processing (PDP)



Personal Data Processing

Complete this form by indicating if your department collects and/or stores personal data. If data is downloaded from a source other than a central system (e.g. ITS, Core HR, Workbench etc) please indicate if consent is received.

Definitions:	
Data Overseer	
	Enter the name and position of the person or people within the department with responsibility for management and control of the data.
Stored Data	
	The data is stored manually or if held electronically, on a system other than a central University system e.g. a shared drive
Secured: Is this data secure?	
Manual:	Data is in a locked filing cabinet in a locked office in a locked building
Electronic:	The file or folder on the shared drive is password protected. For IT systems, users have individual non-shared passwords
Retention Applied	
retention policy	Data is not retained for longer than is necessary. Please review the retention policy of the University.
Data Source: Central System	
	A central system is an application or system that is administered maintained and managed by the University e.g ITS, Core HR, Workbench, Moodle.
Consent	
	Consent is required if the data has not been sourced from central University systems. Please indicate if consent is required and if so please indicate if consent has been received. 'Consent' means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

Department/Office:	
Complete by:	
Data Overseer(s):	
Date:	

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