

Student Data Privacy Notice

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Related Policies:	Data Protection Policy Employee Data Protection Privacy Notice Personal Data Security Incident/Breach Management Procedures

Revision History

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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.

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 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:
(<https://www.maynoothuniversity.ie/freedom-information/records-management/records-management-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, 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 legislation.

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
- Date of Birth
- Country of Birth
- Nationality
- 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)
- 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 images

Sensitive Personal Data is collected/maintained by a limited number of offices and is 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 Garda 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 basis 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.
- That this is necessary for compliance with a legal obligation that applies to us.

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.

8. Recipients of Student Personal Data

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

- 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 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.

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 or erasure 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 object to the processing of the personal data we hold about you in certain circumstances.
- 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 Officer.
- The Data Protection Officer will assist the University and its staff in complying with the Data Protection legislation by providing and facilitating, support, assistance, advice and training.

12. 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 Universities Data Protection Officer:

E-mail: dataprotection@mu.ie

Telephone: +353 1 7086184

Postal Address: Data Protection Officer,
Maynooth University,
Room 17,
Humanity House
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

13. 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 Commissioner (<https://www.dataprotection.ie/>).

Phone Number	+353 761 104 800 / +353 57 868 4800
Fax	+353 57 868 4757
E-mail	info@dataprotection.ie
Postal Address	Data Protection Commission 21 Fitzwilliam Square South Dublin 2 D02 RD28 Ireland

14. 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.

15. General

All Data Protection issues should be addressed to the:

Data Protection Officer

Ann McKeon
dataprotection@mu.ie
Tel +353 1 7086184

Controller

Maynooth University
Maynooth
County Kildare
Ireland
W: www.maynoothuniversity.ie

Maynooth University
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Maynooth, Co. Kildare, Ireland.

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