



## Laidlaw Undergraduate Leadership and Research Programme Data Protection Statement

Updated | 16 November 2021

### INTRODUCTION

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This is a statement of the practices of Trinity Careers Service (“the Service”) in connection with the processing of personal data for the purposes of the Service in administering the Laidlaw Undergraduate Leadership and Research Programme and the steps taken by Trinity College Dublin (“Trinity College” / “the University”) as a data controller to safeguard individuals’ rights under data protection legislation, specifically the EU General Data Protection Regulation (“GDPR”) and Data Protection Acts 1988-2018.

Trinity College fully respects your right to privacy and actively seeks to preserve the privacy rights of data subjects who share personal data with the University. Any personal information which you volunteer to the Service will be treated with the highest standards of security and confidentiality, in accordance with data protection legislation.

This statement outlines:

- Definitions of your personal data
- How the Service processes your personal data
- The purpose and legal basis for processing your personal data
- How we store and secure personal data
- Details of third parties with whom we share personal data
- Other contexts in which Laidlaw Scholar data is shared
- Your rights under data protection legislation

### DEFINITIONS

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#### Personal data

Any information relating to an identified or identifiable natural person (‘data subject’).

#### Special Categories of Personal Data (Sensitive personal data)

- Data concerning health
- Personal data revealing racial origin, ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade-union membership
- The processing of genetic data for the purpose of uniquely identifying a natural person
- The processing of biometric data for the purpose of uniquely identifying a natural person
- Data concerning a natural person's sex life or sexual orientation

#### An tSeirbhís Ghairmthreorach

An Dara hUrlár, 7/9 Sráid Laighean Theas,  
Coláiste na Tríonóide, Baile Átha Cliath,  
Baile Átha Cliath 2, Éire

#### Careers Service

2<sup>nd</sup> Floor, 7-9 South Leinster St  
Trinity College Dublin,  
Dublin 2, Ireland

T: 353 (0) 1 896 1721/1705

Careers@tcd.ie  
www.tcd.ie/Careers



### Processing

Any operation or set of operations performed on personal data. Processing includes storing, collecting, retrieving, using, combining, erasing and destroying personal data, and can involve automated or manual operations.

### Data subject

Someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### Data controller

An organisation, such as Trinity College, which determines the purposes and means of the processing of personal data.

### Data processor

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller, traditionally under contract. This does not include Service staff who are processing personal data on behalf of the University as part of their employment duties.

### How we process your personal data

The personal data we collect from you will only be processed by the Service for the specific and lawful purposes as outlined in this privacy statement.

## HOW WE PROCESS YOUR DATA

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Your data is processed in the following ways:

### Electronic data

- When you book an appointment or event via the Service, we access your personal data from the SITS student administration system (“SITS”)
- For email communication and general administration, we use Microsoft Office 365
- For administration and communication with Laidlaw Scholars we use Microsoft Teams
- To keep administrative records for Laidlaw Programme activities we use MyCareer, Trello, and Microsoft Office 365
- For videoconferencing we use Microsoft Teams, Zoom, and BB Collaborate Ultra
- For feedback and surveys, we use Microsoft Office Forms and TargetFeedback

### Paper-based data

- Laidlaw Scholar administrative files and submissions, when produced in paper version, are retained for a defined period of time after the conclusion of the related cohort of the Laidlaw Programme

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## PURPOSE AND LEGAL BASIS FOR PROCESSING DATA

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Records are maintained within the Laidlaw Programme for the purposes of facilitating the Programme activities, including applications and interviews, workshop administration, coaching, and financial management. For students who join the Programme as Laidlaw Scholars, records are maintained to facilitate the research, coaching, and development activities and allow staff to support and advise participants effectively.

Precise record keeping can also help provide clarity and context for appropriate duty of care in the course of a student's involvement with the Laidlaw Programme. For the purposes stated confidential electronic and paper-based records in respect of students who apply to or/and participate in the Programme will be maintained.

Student records are maintained for the purposes of aiding in the monitoring of a Scholar's learning development and progress. Sufficient record keeping also aids the appropriate discharge of responsibilities for staff and students in terms of programme requirements, conduct and engagement, and accessibility support. Precise record keeping can help provide clarity in the event of legal or ethical proceedings. For the purposes stated above, confidential electronic and paper-based notes of appointments, sessions and meetings may be recorded.

Any personal data you provide when engaging with the Service will be processed fairly and lawfully in accordance with data protection legislation.

- Under Article 6 GDPR your personal data will be processed on the legal basis of consent.
- Under Article 9 GDPR your sensitive personal data will be processed on the exemption of explicit consent provided.

When registering with the Service for the Laidlaw Programme you will be asked to complete the following forms and provide your consent to processing:

- Registration forms to be completed during the induction process
- Additional administrative questionnaires as required

Under GDPR, consent can only be valid if it is a clear, specific, freely given and unambiguous indication of the data subject's wishes. Unless valid consent is obtained the Service will not be permitted to process your personal data.

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## DETAILS OF THIRD PARTIES WITH WHOM WE SHARE PERSONAL DATA

The Service will only share your data with third parties (internal and external) where necessary for the purposes of processing outlined in this privacy statement. This will only be done with your express consent.

The following table details the third parties with whom your personal data is shared together with the purposes for the sharing:

|                               |  |
|-------------------------------|--|
| Microsoft - Office 365        | Email correspondence, spreadsheets & reports, collaborative activities and feedback via MS Teams, student/Scholar data     |
| MyCareer                      | To store and utilise student/Scholar data for appointments and event bookings  |
| Development activity partners | Third party partners working with us to deliver part of the leadership development programme (workshops, coaching, events) |
| Facilities and vendors        | Logistical information in terms of venue bookings, catering (allergies and dietary requirements, access requirements)      |
| Laidlaw Foundation            | As outlined in the Laidlaw Foundation's Fair Processing Notice, provided during Scholar induction processing               |
| TargetFeedback                | To administrate feedback and registration surveys  |
| Zoom                          | Group development events, 1:1 activities as required   |
| BB Collaborative Ultra        | Group development events, 1:1 activities as required   |
| Trello                        | To manage Programme events and individual advisory activities  |

## OTHER CONTEXTS IN WHICH LAIDLAW SCHOLAR DATA IS SHARED

In addition to the processing of your data for the purpose of participating in the Programme, there are other contexts in which your data will be shared in line with the aims and activities of the Programme. This includes acknowledgement of your status as a Laidlaw Scholar, promotional and networking activities, and activities which further develop the Laidlaw Scholar community.

You will be asked to give consent to this at point of Programme registration and will be made aware of individual contextual use of data where feasible. These uses will include:

- Your name and project title will be published on the University's Laidlaw webpages and related material
- Your name, email address, and related programme details will be provided to the Laidlaw
- Your contact information and basic details as a Laidlaw Scholar will be provided to other Laidlaw Scholars to facilitate peer work, community events, development activities

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- Your contact information and basic details to the Laidlaw Foundation to facilitate their communication with you as part of the Laidlaw Scholars Network
- Your programme outputs including research posters and reflective reports are shared on the Laidlaw Network for peer learning purposes
- Photos, video and testimonials from Laidlaw scholars and Laidlaw events may be used for documentation, for displays, in newsletters, publications, on social media, on our website, or to promote the Laidlaw Programme, the Trinity Careers Service and Trinity College Dublin in future
- You will be asked to provide your consent to further data sharing provisions in your scholarship agreement with the Laidlaw Foundation

#### HOW WE SECURELY STORE YOUR DATA

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Any data we collect from you will be stored confidentially and securely as required by the [Trinity College Information Systems Security Policy](#) and [Data Protection Policy](#). The University is committed to ensuring that the processing of your data is performed in a secure manner relevant to the processing, in accordance with Article 32 GDPR requirements.

When we store your personal data on our systems the data will be stored either on the University premises or on secure IT platforms within the European Economic Area which are subject to GDPR requirements.

Trinity College will share your personal data with third parties where necessary for purposes of the processing outlined in this privacy statement. When we share your data with third parties the Service will ensure that the data is only processed according to specific instructions and that the same standards of confidentiality and security are maintained. In accordance with Article 28 GDPR, once the processing of the data is complete any third parties with whom data is shared will be required to return the data to the University save where they are required to retain it by law.

#### HOW LONG WE RETAIN YOUR DATA

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In keeping with the data protection principle of storage limitation we will only retain your data for as long as is necessary. For the purposes described in this privacy statement we will store your data for the duration of your studies plus seven years in accordance with the [Trinity College Records Management Policy](#).

#### YOUR RIGHTS UNDER DATA PROTECTION LAW

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You have the following rights over the way we process your personal data. For further information please see the Trinity College Data Subject Rights Requests Procedure.

##### **Right of Access**

You have the right to request a copy of the personal data which is processed by the Service, including your Scholar record, and to exercise that right easily and at reasonable intervals.

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### Consent

You have the right to withdraw your consent to the processing of your personal data. You may withdraw your consent to the Service processing your personal data at any time. To withdraw your consent, we require you to advise the Service in writing.

### Rectification

You have the right to have inaccuracies in personal data that we hold about you rectified.

### Erasure

You have the right to have your personal data deleted where we no longer have any justification for retaining it, subject to exemptions such as the use of pseudonymised or anonymised data for scientific research purposes.

### Object

You have the right to object to processing your personal data if:

- We have processed your data based on a legitimate interest or for the exercise of the public tasks of the University if you believe the processing to be disproportionate or unfair to you.
- The personal data was processed for the purposes of direct marketing or profiling related to direct marketing.
- We have processed the personal data for scientific or historical research purposes or statistical purposes unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### Restriction

You have the right to restrict the processing of your personal data if:

- You are contesting the accuracy of the personal data.
- The personal data was processed unlawfully.
- You need to prevent the erasure of the personal data in order to comply with legal obligations.
- You have objected to the processing of the personal data and wish to restrict the processing until a legal basis for continued processing has been verified.

### Portability

Where it is technically feasible you have the right to have a readily accessible machine readable copy of your data transferred or moved to another data controller where we are processing your data based on your consent and if that processing is carried out by automated means.

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#### FURTHER INFORMATION

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If you have any queries relating to the processing of your personal data for the purposes outlined above or you wish to make a request in relation to your rights, you can contact the Service at: [employability@tcd.ie](mailto:employability@tcd.ie)

If you wish to make a complaint or escalate an issue relating to your rights you can contact the Trinity College Data Protection Officer at: [dataprotection@tcd.ie](mailto:dataprotection@tcd.ie)

If you are not satisfied with the information we have provided to you in relation to the processing of your personal data or you are dissatisfied with how Trinity College is processing your data you can raise a concern with the Data Protection Commission at: <https://forms.dataprotection.ie/contact>

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