



Trinity College Institute of Neuroscience Privacy Notice

Introduction

This is a statement of the practices of Trinity College Institute of Neuroscience (“**the Service**”) in connection with the processing of personal data for the purposes of our services and the steps taken by Trinity College Dublin, the University of 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 provide to the Institute of Neuroscience will be treated with the highest standards of security and confidentiality, in accordance with data protection legislation.

This Privacy Statement explains the following

- How the Service collects your personal data
- The purpose and legal basis for processing your personal data
- How we securely store your personal data
- Details of third parties with whom we share personal data
- Your rights under data protection legislation.

How we collect your personal data

We collect personal data to provide our services to you. This data may be collected directly from you by our staff or from other systems under the control of Trinity College or from third parties including individuals with whom we communicate or interact with in the course of providing our services, by email, telephone, completion of forms, surveys or otherwise.

Purpose and legal basis for processing personal data

The personal data we collect from you will only be processed by the Institute of Neuroscience for the specific and lawful purposes as outlined in this Privacy Notice. Trinity College will ensure that your data is processed fairly and lawfully in keeping with the principles of data protection as set out under Article 5 GDPR.



Trinity College Institute of Neuroscience Privacy Notice

Specifically, your personal data may be processed for any or all of the following purposes:

Process	Purpose	Legal basis for processing under GDPR
Processing MRI participant structural scans	Essential element of research and for review of MRI images as may be required	<p>Article 6(1)(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Article 9(2)(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject</p>
Applications for and administration of research funding.	To request research funding from the relevant funding bodies and associated reporting	<p>Article 6(1)(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Article 9(2)(g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.</p>
Marketing/Events/Website Users.	Promotion of services.	Article 6(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

For further information on personal data processing at Trinity College Dublin please see <https://www.tcd.ie/privacy/>

Trinity College Institute of Neuroscience Privacy Notice

The Institute of Neuroscience has compiled processing records, in accordance with Article 30 GDPR requirements. If you require further detail, please contact [conneec@tcd.ie].

How we securely store your personal data

Personal data 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 safeguarded by appropriate technical and organisational security measures 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 University premises or on secure IT platforms within the European External Area (“EEA”) or external of the EEA which are subject to Chapter V GDPR requirements.

Details of third parties with whom we share personal data

The Service will only share your data with third parties where necessary for the purposes of processing outlined in this Privacy Statement. In accordance with Article 28 GDPR, when we share your data with third parties the Service will ensure that the data is processed according to specific instructions and that the same standards of confidentiality and security are maintained.

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

Health Service Executive (HSE) and associated hospitals	MRI data processing
Business partners, suppliers and subcontractors.	Performance of any contract to the University.
Research and National Funding Bodies e.g. Science Foundation Ireland, the Health Research Board, European Commission, Philanthropic funders	Research Funding and administration
Microsoft	Administration
Amazon Web Services	Cloud computing



How long we retain your data

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 in accordance with the Trinity College [Records Management Policy](#).

Your rights under data protection law

You have the following rights over the way we process your personal data. For further information please see the Trinity College [Data Subject Rights Request Procedure](#).

Right of Access

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

Consent

You may withdraw your consent to the Service processing your personal data at any time when consent is the legal basis for the processing. 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.



Trinity College Institute of Neuroscience Privacy Notice

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.

Cookies

We use information gathered from cookies to help improve your experience of our website. Some cookies are essential so you can move around the website and use its features. Our website also contains third party cookies which are listed in our [Cookie Register](#). You can refuse or consent to third party cookies when you first visit our website or by following the guidelines in our [Cookie Policy](#).

Further information

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 our office at: [conneec@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:

Email: dataprotection@tcd.ie

Post:

Data Protection Officer
Secretary's Office,
Trinity College Dublin,
Dublin 2,
Ireland.



Trinity College Institute of Neuroscience Privacy Notice

Oifigeach Cosanta Sonraí
Oifig an Rúnaí,
Coláiste na Tríonóide, Baile Átha Cliath,
Baile Átha Cliath 2,
Éire.

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 make a complaint to the Data Protection Commissioner at:

<https://forms.dataprotection.ie/contact>.

Definitions

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

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.



Trinity College Institute of Neuroscience Privacy Notice

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.

Date: 13/05/2021