



Accommodation Office Privacy Statement

Introduction

Trinity College Dublin actively seeks to preserve the privacy rights of data subjects who share personal data with the College. This is a statement of the practices of the Trinity College Accommodation Office regarding the processing of personal data and the steps taken by Trinity College as a data controller to safeguard individuals' rights under data protection legislation, specifically the EU General Data Protection Regulation 2016 (GDPR) and the Data Protection Acts 1988-2018.

This Privacy Statement explains the following

- How the Accommodation Office collects personal data;
- The purpose and legal basis for processing personal data;
- How we securely store personal data;
- Details of third parties with whom we share personal data; and
- Individuals' rights under data protection legislation.

How we collect personal data

We collect personal data to provide our services to students, staff and members of the public. This data may be collected directly from individuals by our staff, via third parties or from other systems under the control of the College.

Purpose and legal basis for processing personal data

Personal data is processed by the Accommodation Office for the specific and lawful purposes as outlined in this Privacy Statement. Trinity College ensures that personal data is processed fairly and lawfully in keeping with the principles of data protection as set out under [Article 5 GDPR](#).

Personal data may be processed for the following purposes:

Process	Purpose	Legal basis for processing under GDPR
Assess applications for Student Accommodation	Management and allocation of student accommodation	Article 6(1)(b) GDPR: 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.



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Review and allocation of Special Consideration Student accommodation applications	Management and allocation of suitable accommodation	Article 9(2)(a) GDPR: the data subject has given explicit consent to the processing of personal data.
Accommodation payment and debt management	Processing and recovery of outstanding fees and payments	Article 6(1)(e) GDPR: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
Provide necessary information to the Residential Tenancies Board (RTB)	To register tenants in Trinity owned accommodation with the RTB	Article 6(1)(c) GDPR: processing is necessary for compliance with a legal obligation.
Management of Summer Accommodation on Campus and Trinity Hall	Management and allocation of accommodation	Article 6(1)(f) GDPR: processing is necessary for the purposes of the legitimate interests of the College.
Accommodation payment and debt management	Processing and recovery of outstanding payments for accommodation	Article 6(1)(f) GDPR: processing is necessary for the purposes of the legitimate interests of the College.
Staff Recruitment	To assist in the management of the accommodation	Article 6(1)(b) GDPR: 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.
Arrange Health and Safety training for temporary summer-time staff	To ensure staff are appropriately trained	Article 6(1)(c) GDPR: processing is necessary for compliance with a legal obligation.

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

How we securely store 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 College is committed to ensuring that the processing of personal data is safeguarded by appropriate technical and organisational security measures relevant to the processing in accordance with Article 32 GDPR requirements.

When we store personal data on our systems the data will be stored either on College premises or on secure IT platforms within the European Economic Area ('EEA') or at locations outside of the EEA in a manner that is compliant with [Chapter V GDPR](#) requirements.



Details of third parties with whom we share personal data

The Accommodation Office will only share personal 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 personal data with third parties the Accommodation Office 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 personal data is shared together with the purposes for the sharing:

KX Residential and conferencing software platform	Management of accommodation bookings
SITS	Confirmation of student status
Residential Tenancies Board (RTB)	To register tenancies with the Residential Tenancies Board
Uninest Ireland Kavanagh Court Management)	Provision of student accommodation at Kavanagh Court
Netaffinity.com	Management of direct accommodation bookings
Realex	Processing accommodation payments
Microsoft Office 365	Accommodation Office administration

How long we retain personal data

In keeping with the data protection principle of storage limitation we will only retain personal data for as long as is necessary. For the purposes described in this Privacy Statement we will store personal data in accordance with the Trinity College [Records Management Policy](#).

Individuals' rights under data protection law

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

Right of Access

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



Consent

Individuals may withdraw consent to the Accommodation Office processing personal data at any time, when consent is the legal basis for the processing. To withdraw consent to processing, we require individuals to advise the Accommodation Office in writing (contact details below).

Rectification

Individuals have the right to have inaccuracies in personal data processed by the Accommodation Office rectified without undue delay.

Erasure

Individuals have the right to have personal data deleted where there no longer remains justification for retaining it, subject to exemptions.

Object

Individuals have the right to object to the processing of personal data if:

- We have processed personal data based on a legitimate interest or for the exercise of the public tasks of the College if individuals believe the processing to be disproportionate or unfair.
- 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

Individuals have the right to restrict the processing of personal data if:

- Contesting the accuracy of the personal data.
- The personal data was processed unlawfully.
- The erasure of the personal data is necessary in order to comply with legal obligations.
- Individuals 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 personal data transferred or moved to another data controller where we are processing personal data based on consent and if the processing is carried out by automated means.



Cookies

We use information gathered from cookies to help improve user experience of our website. Some cookies are essential to navigate around the website and use its features. The Trinity College website also contains third party cookies which are listed in our [Cookie Register](#). Individuals can refuse or consent to third party cookies when visiting the Trinity College 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 the Accommodation Office:

Email:

<https://www.tcd.ie/accommodation/contact/>

Post:

Accommodation Office,
Trinity College Dublin,
Dublin 2,
Ireland.

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.

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 contact the Data Protection Commission 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.

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 Accommodation Office staff who are processing personal data on behalf of the College as part of their employment duties.

Date: 01 July 022