



Data Subject Rights Request Procedure

Purpose

The purpose of this procedure is to ensure that Trinity College Dublin complies with the Data Subject Rights provisions of [Chapter 3](#) of the EU General Data Protection Regulation ('GDPR').

These Rights apply to the processing of **personal data**, which is defined under GDPR:

as any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one 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.

The following Data Subject Rights are set out under Chapter 3:

- **Articles 13 & 14:** Right to be informed
- **Article 15:** Right of access
- **Article 16:** Right to rectification
- **Article 17:** Right to erasure ('right to be forgotten')
- **Article 18:** Right to restriction of processing
- **Article 20:** Right to data portability
- **Article 21:** Right to object
- **Article 22:** Automated individual decision-making, including profiling

It is important to note that these Rights are **not absolute**, and may be subject to certain exceptions or restrictions as set out under GDPR and the Data Protection Act 2018.



Right to be Informed – Privacy Notice

In order to lawfully process personal data Trinity College must do so in a way that is fair and satisfies the [principles of personal data processing](#) as set out under GDPR. The principle of transparency is directly linked to the right to be informed. This means that Data Subjects must be informed about the processing of their personal data including the purpose and the lawful basis for the processing. This information must be provided, via a Privacy Notice / Statement in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

Please see <https://www.tcd.ie/dataprotection/privacynotice/> for information on how to draft a Privacy Notice which meets Articles 13 and 14 GDPR requirements.

Right of Access – Data Access Request

Data Subjects who wish to access their personal data that is held on file by Trinity College may make an data access request. Access requests must be made in writing. Data Subjects are advised to use the College Data Access Request Form for this purpose.

To help Trinity College to respond to an access request, individuals should be as specific as possible about the information sought.

Any additional details that assist to locate the information, for example; staff or student number, names of relevant departments/offices, relevant time periods etc. will be most useful in processing the request in a compliant manner.

Other Data Subject Rights

Data Subjects who wish to exercise the right to rectification, right to erasure ('right to be forgotten'), the right to restriction of processing, the right to data portability or the right to object to processing must do so in writing and it will be considered without undue delay by the Data Protection Officer and the relevant Head of School / Unit.

The written request should be sent to:

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

or

Via email: dataprotection@tcd.ie.



Identification

In order to ensure that personal data is not disclosed to the wrong person, Data Subjects may be required to provide proof of identity before any personal data is released, depending on the nature of the request. Acceptable forms of identification include: copy of passport or driving licence; staff/student ID card; copy of bank statement; copy of utility bill. Copies are acceptable in most cases, however Trinity College reserves the right to ask to see original documents where necessary. If individuals are required to provide copies of such documents to the University, they will be securely destroyed once identity has been verified.

Right to Notify the Data Protection Commission

If Data Subjects are unhappy with the outcome of a Rights Request, they should raise a concern with the [Data Protection Commission](#).

Further Information

Further information on Rights of Data Subjects under data protection law is available from:

Trinity College Data Protection Office

Secretary's Office

Trinity College

Dublin 2

Ireland

dataprotection@tcd.ie

<https://www.tcd.ie/dataprotection/>

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

Ireland

<https://www.dataprotection.ie/en/contact/how-contact-us>