



## **Estates & Facilities Privacy Statement**

### **1. Introduction**

This Privacy Statement describes the process for capturing personal data and the steps taken by the Estates & Facilities department to respect your privacy.

Estates & Facilities, as part of the Corporate Services Division in Trinity College Dublin, ('Trinity College' / 'the University') fully respects your right to privacy and actively seeks to preserve the privacy rights of those who share information with the department. Any personal information that you volunteer to the department will be treated with the highest standards of security and confidentiality in accordance with Irish and European Data Protection legislation, namely the Data Protection Act 2018 and EU General Data Protection Regulation ('GDPR').

### **2. Definitions**

#### **Personal Data**

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

#### **Special Categories of Personal Data (Sensitive 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

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### **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 Trinity College staff who are processing personal data on behalf of the University as part of their employment duties.

## **3. Our services**

Estates & Facilities, as part of the Trinity College Corporate Services Division, is responsible for the planning, development, operation and maintenance of the University's buildings, sites and facilities.

Through our four primary operating departments, Health & Safety; Estates Policy, Capital Projects and Planning; Facilities & Services and Shared Administrative Support Services, we maintain the University's energy supply and utility infrastructure, provide facilities support and provide a wide-range of engineering and technical services that improve efficiency and sustainability. We also undertake the Trinity College capital development programme and provide advice and guidance on safety event management for the University.

#### **4. How is your personal data collected?**

Estates & Facilities will use the personal data collected from you, only in accordance with the purposes outlined in this Privacy Statement. Your data will be collected in the following manner:

- Written forms and documents
- Emails and phone requests
- HR department
- Software used by Estates & Facilities
- CCTV Recordings
- Access Control System
- Guard Tools Security Logs

The data collected in this form will be shared (where relevant) with the following areas of the University: HR, Academic Registry, FSD, CRU, Accommodations Office, Senior & Junior Dean, Senior Tutor, Dean of Students, Secretary's Office, Disability Services, Student Health, Student Counselling, Comparative Medicine and / or various departments that have restricted access rights to the access control system.

#### **5. The purpose and legal basis for collecting your data**

Estates & Facilities will ensure that your data is processed fairly and lawfully in keeping with the principles of data protection. For the purposes outlined in this Privacy Statement, your personal data will be processed on the basis of performance of a contract in compliance with employment legislation.

##### **Staff**

Personal data is collected for the purposes of recruitment and for the formation and administration of the contract of employment and employee relationship. Furthermore, personal data may be collected for human resource and pension administration purposes in connection with your contract of employment.

##### **CCTV**

The administration of campus CCTV for security and provision of a safe environment for educational activities is processed on the basis of legitimate interest of the University and statutory requirement.

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CCTV cameras are in operation on campus in consultation with the Gardai in order to provide enhanced protection for students, staff and visitors as well as University buildings and facilities in the context of an open campus.

You can find more information in our [CCTV Policy](#).

### **Special Categories of Personal Data**

The University processes special categories of data (sensitive data) that relate to you in limited circumstances and in accordance with data protection law. These are typically related to the ordinary course of human resources administration and include the exercising of rights and performance of obligations under employment and social security law. The University will process special category data where necessary for the purposes of assessing the working capacity of employees and for the purposes of occupational and preventative medicine and ill health retirements.

Estates & Facilities may, in certain circumstances, process your special category data where

- It is necessary for the purposes of providing or obtaining legal advice or for the purposes of, or in connection with, legal claims, prospective legal claims, legal proceedings or prospective legal proceedings, or is otherwise necessary for the purposes of establishing, exercising or defending legal rights
- It is related to the management of medical risk and medical claims.

### **Medical Information**

The purpose that this data is used for is to manage employee absences, to manage sick pay in accordance with the contract of employment, to allow the University to assess the fitness to work of relevant employees and to assess qualification for payments under the Critical Illness Protocol and Temporary Rehabilitation Remuneration (TRR) as permitted by data protection law. The processing is necessary to assess, subject to appropriate safeguards, the working capacity of the employee and to carry out obligations and exercise rights under employment law and to achieve the legitimate business interests of Trinity College and to meet the University's legal obligations as an employer.

### **Disciplinary Investigations**

The processing is necessary to assess, subject to appropriate safeguards, the working capacity of the employee and to carry out obligations and exercise rights under employment law and to achieve the legitimate business interests of Trinity College and to meet the University's legal obligations as an employer. The processing is also necessary to apply fair

procedures to any employee investigation, for the performance of the employment contract, to achieve the legitimate interests of Trinity College and to meet the University's legal obligations as an employer.

### **6. How we store and secure your data**

Any personal data collected from you will be stored confidentially and securely as required by the [University Information Security Policy](#). In keeping with the data protection principles, your data will be only stored for as long as is necessary and in accordance with our Records Management Policy and Records Retention Schedule.

Estates & Facilities is committed to protect and secure your data, by securing our laptops, using encryption services, establishing strong passwords to access our computers, documents emails, etc. and doing regularly backups of important data.

When your personal data is stored on our systems the data will be stored either on the University premises or on secure IT platforms which are also subject to European data protection requirements.

### **7. Details of third parties with whom we share personal data**

Estates & Facilities will share your data with third parties, where necessary for purposes of the processing and where there is a legal basis to do so. Contracts are in place with third party data processors and associated data controllers that protect your rights under data protection law.

When your data is shared with contracted third parties, Estates & Facilities will ensure that the data is only processed according to our specific instructions and that the same standards of confidentiality and security are maintained.

Estates & Facilities may share relevant personal data with the following categories of third parties:

- IT or Cloud service providers that provide essential services to the University e.g. security diary, access control, intruder alarm logs
- IT or Cloud service providers of work management system
- Firms that provide professional services to the University, such as legal firms and auditors

- Firms and individuals that provide services to the University, such as insurance brokers and providers and pension administrators
- Firms that provide archiving and storage and disposal of confidential waste
- An Garda Síochána when required to do so by law

## **8. Your rights under data protection law**

You have the following rights over the way your personal data is processed.

### **Right of Access**

You have the right to request a copy of the personal data processed about you and to exercise that right easily and at reasonable intervals.

### **Right to Correct**

You have the right to have inaccuracies in personal data retained about you rectified.

### **Right to Erase**

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

### **Right to Data Portability**

The right to request that your data is moved, copied or transferred.

### **Right to Object**

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

- Your data is processed 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
- Your personal data was processed 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

### **Right to Restriction of Processing**

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

### **9. Data Breach**

Under the GDPR a breach which is reportable to the Data Protection Commission must be reported not later than 72 hours after having become aware of it. All breaches or suspected breaches should therefore be reported to the [Trinity College Data Protection Officer](#) without delay for assessment.

### **10. Contact**

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:

Estates & Facilities Service Centre  
194 Pearse St  
Trinity College  
Dublin 2  
+353 1 896 4000  
[estatesandfacilities@tcd.ie](mailto:estatesandfacilities@tcd.ie)

If you wish to make an enquiry, complaint or escalate an issue relating to your data protection rights you can contact the Trinity College Data Protection Officer at:

Data Protection Officer  
Secretary's Office  
Trinity College Dublin  
Dublin 2  
[dataprotection@tcd.ie](mailto:dataprotection@tcd.ie)

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Finally, if you are not satisfied with the information that Trinity College has provided to you in relation to the processing of your data you can make a complaint to the Office of the Data Protection Commission via the link on their website [making a Complaint to the DPC.](#)