



Privacy Statement

Welcoming International Students Back to Trinity College in Safety – Academic Year 2020/21

Introduction

This is a statement of the practices of Trinity College Dublin, The University of Dublin (“**Trinity College**” / “**the University**”) in connection with the processing of personal data for the purposes of supporting and managing the arrival and restriction of movements for 14 days of students where their country of domicile is outside of Ireland to support the protection of public health 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 (“**GDPR**”) and Data Protection Acts 1988-2018.

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

This Privacy Statement explains the following

- How Trinity College collects your personal data;
- How we securely store your personal data;
- The purpose and legal basis for processing your personal data;
- Details of third parties with whom we share personal data; and
- 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.

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 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.

Purpose and legal basis for processing personal data

The personal data we collect from you will only be processed by Trinity College for the specific and lawful purposes as outlined in this Privacy Statement. 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.

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

| Process | Purpose | Legal basis for processing under GDPR |
|--|--|---|
| Obtain pre-departure symptom tracking information from incoming international students for a 14-day period prior to their arrival. | To comply with prevailing public health measures in Ireland. | Article 6 (1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Article 9 (2)(i) - processing is necessary for reasons of public interest in the area of public health. |
| Inform incoming international students that they have to restrict their movements for a period of 14 days after their arrival from outside of Ireland. | To comply with prevailing public health measures in Ireland. | Article 6 (1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. |
| Advise incoming international students of the need to restrict their movements in the 14 days after their arrival from outside of Ireland. | To comply with prevailing public health measures in Ireland. | Article 9 (2)(i) - processing is necessary for reasons of public interest in the area of public health. |
| Extract contact details of new undergraduate and new post graduate students and all continuing students where their country of domicile is outside of Ireland. | Details required to identify the relevant students for this communication. | Article 6 (1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. |



| | | |
|---|--|---|
| <p>Issue correspondence to applicants who have accepted offers on academic courses, new undergraduate, new postgraduate and all continuing students where the country of domicile is outside of Ireland and review responses to identify transportation and accommodation requirements.</p> | <p>To obtain the contact details, accommodation address, whether mobility assistance is required, identify the country the student is travelling from, whether or not it is on the 'green List', flight information, expected date and time of arrival, and details of accommodation address while in Ireland, confirmation that the individual will restrict their movement for 14 days on arrival at this address, their postal address post the 14 days of restricted movement.</p> <p>Whether or not the student requires mobility assistance.</p> <p>Where the student is arranging their own accommodation for the 14 day period, the address of that accommodation.</p> | <p>Article 6 (1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> |
| <p>Using contact details for important communications.</p> | <p>Contact information required for communications purposes.</p> | <p>Article 6 (1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> |
| <p>Trinity-arranged accommodation address.</p> | <p>To identify the address where the student is staying for the duration of their 14-day restricted movement requirement</p> | <p>Article 6 (1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> |
| <p>Self-arranged accommodation address.</p> | <p>To identify the address where the student is staying for the duration of their 14-day restricted movement requirement.</p> | <p>Article 6 (1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> |

Details of third parties with whom we share personal data

Trinity College 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, Trinity College 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:

| | |
|-------------------------------------|---|
| Cogs & Marvel | To arrange airport transfers for incoming non-Irish domiciled students between the Airport and the residence where they are residing for the duration of the 14-day restricted movement period. |
| 3Communications | Essential communications. |
| Residential Accommodation Providers | To arrange accommodation and associated services. |
| Microsoft | General administration via Office 365. |

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 up to the end of January 2021 and 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 Requests Procedure](#).

Right of Access

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

Consent

You have the right to withdraw your consent where that is the legal basis of our processing.

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.

Cookies

We use information gathered from cookies to help improve your experience of our websites. Some cookies are essential so you can move around the websites and use their features. Our websites 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 or 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.

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

Website: https://www.tcd.ie/info_compliance/data-protection/

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 Irish Data Protection Supervisory Authority, 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 Trinity staff who are processing personal data on behalf of the University as part of their employment duties.
