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 Provost Appointment Electronic Voting (‘e-voting’) process and the steps taken by Trinity College as a data controller to safeguard individuals’ rights in accordance with data protection legislation, specifically the EU General Data Protection Regulation 2016 (‘GDPR’) and Data Protection Acts 1988-2018.

Details of third parties with whom we share personal data

Trinity College has engaged the services of a third party service provider, Mi-Voice - Democracy Technology Ltd., to provide e-voting services for the Provost Appointment. A data processing agreement between Trinity College and Mi-Voice has been approved by the Secretary’s Office. This agreement includes the necessary provisions to meet GDPR compliance requirements in respect of international data transfers.

The Mi-Voice Privacy Policy is available to view at: https://www.mi-voice.com/privacy-policy/.

What personal data will be processed

- Electorate names and email addresses only are processed by Trinity College as part of the e-voting process.
- Electorate names and email addresses only are shared with Mi-Voice as part of the e-voting process.
- A Unique Voter Code (‘UVC’) is generated for each voter by Mi-Voice. This data only is then used for the e-voting process.

Purpose and legal basis for processing personal data

As a controller of personal data, Trinity College takes all appropriate measures to ensure that data is processed fairly and lawfully and in accordance with the principles of data protection as set out under Article 5 GDPR. Personal data as described above will only be processed for the specific and lawful purpose of conducting the Provost Appointment via e-voting. The legal bases for processing are:

- 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 vested in the controller’.
- Sections 14 and 18 of the Universities Act, 1997.
Data security

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 personal data is safeguarded by appropriate technical and organisational security measures relevant to the processing in accordance with Article 32 GDPR requirements.

Personal data processed on University-controlled systems will be managed either on University premises or on secure IT platforms within the European External Area (‘EEA’) / external of the EEA in compliance with Chapter V GDPR requirements.

Trinity College has conducted the following assessments of the e-voting process as part of its commitment to ensuring data security:

- Data Protection Impact Assessment
- IT Security Assessment

How long data will be stored

In keeping with the data protection principle of storage limitation the personal data processed for e-voting will only be retained by Trinity College and Mi-Voice for as long as is necessary and then securely destroyed when no longer required. The data will not be processed for any other purposes or shared with other entities.

Individuals’ rights under data protection law

Right of Access

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

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.

Object

You have the right to object to processing your personal data if you believe the processing to be disproportionate or unfair to you.
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.

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 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.

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 raise a concern with the Data Protection Commission at: https://forms.dataprotection.ie/contact.

Date: 10/03/2021.