



# Privacy Policy

## 1. Introduction

- 1.1 This is the Privacy Policy of Dublin City University Educational Trust, which is referred to as “**DCUET**”, “**us**” or “**we**” throughout this Privacy Policy. DCUET is a registered charity (Registered Charity Number 20022419) and its principal objective is the promotion of improved education for both undergraduate and postgraduate students of Dublin City University (“**DCU**”). DCUET advances this objective in particular through various philanthropic and fundraising initiatives, which are undertaken both independently and in collaboration with other organisations, including DCU. This Privacy Policy provides details of the way in which we Process Personal Data in line with our obligations under Data Protection Law.
- 1.2 Capitalised terms used in this Privacy Policy are defined in the Glossary in Annex I.

## 2. Background and Purpose

- 2.1 The purpose of this Privacy Policy is to explain what Personal Data we Process and how and why we Process it. In addition, this Privacy Policy outlines our duties and responsibilities regarding the protection of such Personal Data. The manner in which we Process data will evolve over time and we will update this Policy from time to time to reflect changing practices.
- 2.2 In addition, in order to meet our transparency obligations under Data Protection Law, we will incorporate this Privacy Policy by reference into various points of data capture used by us e.g. donor application forms etc.

## 3. DCUET as a Data Controller

- 3.1 DCUET will act as a Data Controller in respect of Personal Data provided to us by various individuals in connection with the operation and administration of DCUET. Such individuals will generally include the following:
  - (a) Existing donors;
  - (b) Potential donors;
  - (c) DCU alumni and staff;

- (d) Service providers (such as professional advisors, etc.); and
- (e) DCUET staff.

3.2 Personal Data is processed by DCUET for the following purposes:

Purpose of Processing	Lawful Basis under GDPR
Communication with DCU alumni and other individuals from time to time to inform them about events involving the wider DCU community, volunteering opportunities (such as mentoring programmes) and other opportunities to support DCU and or the administration of volunteering programmes.	Consent of data subject per Art. 6(1)(a) GDPR and/or legitimate interest per Art. 6(1)(f) GDPR.
Communication with existing donors and potential donors for the purposes of marketing, raising funds for DCUET.	Consent per Article 6(1)(a) GDPR and/or legitimate interest per Art. 6(1)(f) GDPR. Where DCUET sends marketing communications, we will ensure that a valid marketing consent is in place in accordance with Data Protection Law.
Publishing newsletters, articles and annual reports about our various events and fundraising activities which may contain photographs of and information relating donors, DCU students and staff and other individuals (which will be based on consent).	Consent of the data subject per Art. 6(1)(a) GDPR and/or legitimate interest per Art. 6(1)(f) GDPR.
When visiting the DCUET website you will provide us with certain Personal Data such as your IP address and other electronic identifiers. Such data is used by us for analytics and website operation purposes and otherwise in accordance with the following cookies policy: <a href="https://shapingthefuture.dcu.ie/cookie-policy/">https://shapingthefuture.dcu.ie/cookie-policy/</a>	Legitimate interests of DCUET per Art. 6(1)(f) GDPR.
When you contact DCUET by email, post or phone, including via the contact	Consent of the data subject per Art. 6(1)(a) GDPR.

Purpose of Processing	Lawful Basis under GDPR
details on our website, this will involve the processing of Personal Data to the extent that such communications contain personal data.	
For purposes of personnel administration and related human resources purposes such as payroll and tax reasons (in respect of both employees and contractors). DCUET will also process Personal Data of its board members and trustees in connection with the performance of their functions.	Contractual necessity of the employment contract per Art. 6(1)(b) GDPR.
In making available certain bursaries and scholarships to DCU students, it is necessary for DCUET to obtain and process certain personal data of the applicants for and beneficiaries of such scholarship / bursary programmes.	Contractual necessity of the scholarship/bursary per Art. 6(1)(b) GDPR.
For the purposes of inviting donors, staff, DCU alumni and other individuals to events and ceremonies which DCUET considers may be of interest to them (for example DCU Honorary Degree ceremonies).	Legitimate interests per Art. 6(1)(f) GDPR.
To facilitate and optimise our fundraising initiatives and effectiveness we may use certain of your Personal Data to assess the appropriate level of a donation that we may request from you.	Legitimate interest of DCUET per Art. 6(1)(f) GDPR.

#### 4. DCUET and Data Processors

- 4.1 DCUET will engage certain service providers to perform certain services on its behalf which may involve the Processing of Personal Data, for example third parties that assist with distribution of DCUET newsletters and emails. To the extent that such Processing is undertaken based on the instructions of DCUET and gives rise to a Data Controller and Data Processor relationship, DCUET will ensure that such relationship is governed by a

contract which includes the data protection provisions prescribed by Data Protection Law.

## 5. Sources of Personal Data

- 5.1 We will obtain your Personal Data from a range of sources including directly from you at graduation ceremonies, when you sign up in person or via our website to receive new newsletters and marketing communications and through donor application forms. We also obtain Personal Data of DCU Alumni from the DCU Alumni Office once you graduate from DCU in accordance with DCU's Privacy Policy (<https://www.dcu.ie/ocoo/dp/guides.shtml>) and Data Protection Law. From time to time, we may also collect Personal Data from publicly available sources, including online sources and search engines, LinkedIn and other similar platforms. We also receive information from third parties from time to time, for example where DCU Alumni refer us to friends/colleagues/associates who may be interested in becoming involved with DCUET initiatives.

## 6. Record Keeping

- 6.1 As part of our record keeping obligations under Art. 30 GDPR, DCUET retains a record of the Processing activities under its responsibility. This comprises the following:

Art. 30 GDPR Requirement	DCUET's Record
Name and contact details of the Controller	DCU Educational Trust. Dublin City University, Mac Cormac Building Glasnevin, Dublin 9, Ireland.
The purposes of the processing	See Section 3 of this Privacy Policy.
Description of the categories of data subjects and of the categories of personal data.	See Annex II of this Privacy Policy.
The categories of recipients to whom the Personal Data have been or will be disclosed.	See Section 9 of this Privacy Policy.
Where applicable, transfers of personal data to a third country outside of the EEA.	See Section 9 of this Privacy Policy.
Where possible, the envisaged time limits for erasure of the different categories of	See Section 10 of this Privacy Policy.

Art. 30 GDPR Requirement	DCUET's Record
data.	
Where possible, a general description of the technical and organisational security measures referred to in Article 32(1).	See Annex III of this Privacy Policy.

## 7. Special Categories of Data

7.1 DCUET processes Special Categories of Data ("**SCD**") in certain circumstances, such as the ordinary course of employee administration. DCUET shall Process such SCD in accordance with Data Protection Law.

## 8. Individual Data Subject Rights

- 8.1 Data Protection Law provides certain rights in favour of data subjects. The rights in question are as follows (the "**Data Subject Rights**"):
  - (a) The right of a data subject to receive detailed information on the processing (by virtue of the transparency obligations on the Controller);
  - (b) The right of access to Personal Data;
  - (c) The right to rectify or erase Personal Data (right to be forgotten);
  - (d) The right to restrict Processing;
  - (e) The right of data portability;
  - (f) The right of objection; and
  - (g) The ***right to object*** to automated decision making, including profiling, and where DCUET relies on its legitimate interests to Process your data (including for marketing purposes).
- 8.2 These Data Subject Rights will be exercisable by you subject to limitations as provided for under Data Protection Law. You may make a request to DCUET to exercise any of the Data Subject Rights by contacting DCUET on +353 (0)1 [7005467](tel:7005467) / [edtrust@dcu.ie](mailto:edtrust@dcu.ie).
- 8.3 Your request will be dealt with in accordance with Data Protection Law.

## 9. Data Security and Data Breach

- 9.1 We have technical and organisational measures in place to protect Personal Data from unlawful or unauthorised destruction, loss, change, disclosure, acquisition or access. Personal Data are held securely using a range of security measures including, as appropriate, physical measures such as locked filing cabinets, IT measures such as encryption, and restricted access through approvals and passwords.
- 9.2 The GDPR obliges Data Controllers to notify the Data Protection Commission and affected data subjects in the case of certain types of personal data security breaches. Any Data Breaches identified in respect of Personal Data controlled by DCUET will be

dealt with in accordance with Data Protection Law and DCUET's Data Breach Procedure.

## 10. Disclosing Personal Data

- 10.1 From time to time, we may disclose Personal Data to third parties, or allow third parties to access Personal Data which we Process (for example where a law enforcement agency or regulatory authority submits a valid request for access to Personal Data).
- 10.2 We may also disclose Personal Data to: (a) selected third parties including DCU staff, management and Alumni Office; and (b) service providers, such as those that assist with newsletter and email distribution and our telethon fundraising initiatives, or companies that provide screening and profiling of potential supporters.

## 11. Data Retention

- 11.1 We will keep Personal Data only for as long as the retention of such Personal Data is deemed necessary for the purposes for which that Personal Data are Processed (as described in section 3 of this Privacy Policy).

## 12. Data Transfers outside the EEA

- 12.1 From time to time, DCUET may transfer Personal Data to countries outside the EEA which may not have the same or equivalent Data Protection Law as Ireland. If such transfer occurs, DCUET will ensure that such processing of your Personal Data is in compliance with Data Protection Law and, in particular, that appropriate measures are in place such as entering into Model Contractual Clauses (as published by the European Commission) or ensuring that the recipient is Privacy Shield certified, if appropriate. If you require more information on the means of transfer of your data or would like a copy of the relevant safeguards, please contact DCUET on +353 (0)1 7005467 / [edtrust@dcu.ie](mailto:edtrust@dcu.ie).

## 13. Further Information/Complaints Procedure

- 13.1 For further information about this Privacy Policy and/or the Processing of your Personal Data by or on behalf of DCUET please contact DCUET on +353 (0)1 7005467 / [edtrust@dcu.ie](mailto:edtrust@dcu.ie). While you may make a complaint in respect of our compliance with Data Protection Law to the Irish Data Protection Commission, we request that you contact DCUET on +353 (0)1 7005467 / [edtrust@dcu.ie](mailto:edtrust@dcu.ie) in the first instance to give us the opportunity to address any concerns that you may have.

**Date: 1<sup>st</sup> May 2018**

## ANNEX I: Glossary

In this Privacy Policy, the terms below have the following meaning:

**“Data Breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.

**“Data Controller”** means the entity which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

**“Data Processor”** means the party that Processes Personal Data on behalf of the Data Controller.

**“Data Protection Law”** means the General Data Protection Regulation (No 2016/679) (**“GDPR”**) and the [Data Protection Act 2018] and any other laws which apply to DCUET in relation to the Processing of Personal Data.

**“European Economic Area”** or **“EEA”** means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the UK, Iceland, Liechtenstein, and Norway.

**“Personal Data”** is any information relating to a living individual which allows the identification of that individual. Personal Data can include:

- a name, an identification number;
- details about an individual's location; or
- any other information that is specific to that individual.

**“Processing”** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. **“Process”** and **“Processing”** are interpreted accordingly.

**“Special Categories of Personal Data”** are types of Personal Data that reveal any of the following information relating to an individual: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. Special Categories of Personal Data also include the Processing of genetic data, biometric data (for example, fingerprints or facial images), health data, data concerning sex life or sexual orientation and any Personal Data relating to criminal convictions or offences.

## ANNEX II: Types of Personal Data

Categories of Data Subject	Type of Personal Data
DCU Staff	Name, email address, phone number, home address, department
DCUET Staff	Name, email address, phone number, home address,
DCU Students	Name, email address, phone number, home address, subject(s) studied, student since when
DCU Alumni	Name, email address, date of birth, phone number, home address, year graduated, subject(s) studied, societies/student clubs involved in, business details, career information, LinkedIn URL
DCUET donors and potential supporters	Name, email address, phone number, home address, business details, career information, marital status, education details, interests and activities, donations, interactions with DCU, wealth information and suggested levels of giving, giving to other causes, notes and profiles from media, notes of conversations and discussions that have taken place between you and a member of DCUET/DCU staff and other public sources



## ANNEX III: IT Security Measures

- All DCUET laptops and mobiles phones are encrypted and use McAfee Endpoint encryption software which offers multiple layers of protection that address specific areas of risk.
- Users require a password to login before accessing the operating system. A separate username and password is required to access the DCU staff network.
- Access to DCUET's database system requires a valid DCUET staff log-in name and additional password, which must be changed periodically. The database itself is stored on a secure server. Access is restricted to DCU staff who need to see the data to carry out their work.
- This is limited to members of staff in the Trust, dedicated IT support staff, the Alumni Relations office and colleagues from other areas of DCU who provide services to alumni, such as the Business School.
- DCU's Information Systems Services have invested in comprehensive anti-virus scanning systems to ensure that all email entering and leaving DCU is scanned for known viruses and infected emails are quarantined or deleted where appropriate. Additionally some file extensions which are known to be associated with viruses are blocked by the DCU Mail system.
- DCU uses antivirus software which combines antivirus, antispayware, firewall, and intrusion prevention technologies to proactively detect and remove malware. Information Systems Services constantly monitor the DCU Network for evidence of virus infections.