

Privacy Notice for Students

Introduction

As a student at Atlantic Technological University (ATU) (“the University”), your personal data is processed for various reasons. ATU is the Data Controller of your personal data and is subject to the Data Protection Acts 1988 to 2018 and the General Data Protection Regulation 2016/679 (GDPR). As part of the transparency principle of the GDPR, you have the right to be fully informed about how ATU uses your personal data. This Privacy Notice outlines the types of personal data we will process, the purposes for which that personal data is required, third parties with whom we will share your data, how long your data will be retained by us, your rights and how to contact us.

This notice should be read in conjunction with the University’s Data Protection Policy which is available at <https://www.atu.ie/data-protection>.

The information we process about you

The types of personal data we process about you include, inter alia:

- **Personal details:** Name, date of birth, country of birth, nationality, telephone numbers, addresses, Eircode, PPSN, gender, ATU ID number, email addresses, passport number and car registration number.
- **Financial information:** Bank details including IBAN, BIC, name of bank/building society credit card details (processed in real time but not stored by ATU), grants/payments received, fees paid and outstanding, details of funding.
- **Academic information:** Academic history, previous exam results, schools / colleges attended, course application details, programme details, academic marks & grades, relevant work experience, exam scripts, continuous assessments, qualifications awarded, attendance record, disciplinary information, deregistration rationale, library information etc.
- **Special category (sensitive) personal data:** Health and disability information, medical assessments, religion, ethnic origin, criminal convictions (as provided through Garda Vetting for specific purposes).
- **Interaction details:** Engagement with IT system, LearnOnline/Moodle/Blackboard activity and use of facilities such as the library. We also process texts, emails and hard copy correspondence.
- **Online services:** IP address, and other personal information when you visit the ATU website – more information available on the ATU Website Privacy & Cookies Policy
- **Other personal information:** Disciplinary information, image, voice (in lecture & proctoring recordings), CV, visa information (international students).

You are required to provide Next of Kin/Emergency Contact Details for use only in emergency situations. It is your responsibility to inform such contacts that you will be sharing their personal data with the University.

How we obtain your personal data

We process your personal data at various points in your relationship with ATU. This information is provided by you, either directly or indirectly. It may also be provided by third parties like the CAO, SOLAS, PAC, Springboard, SUSI, Department of Employment Affairs and Social Protection, INIS, etc.

Legal bases for processing your personal information

We process your personal data because it is necessary in order to:

- Fulfil our contractual obligations with you;
- Comply with legal obligations that apply to us;
- Perform functions conferred on us by law and which are carried out in the public interest;
- Perform tasks to which you have provided consent;
- Protect your legitimate interests and the legitimate interests of ATU and third parties (limited scenarios).

Where sensitive personal data is concerned, we process it where:

- You have provided your explicit consent;
- It is necessary for the purposes of preventative or occupational medicine, for the general provision of medical care and, in some instances, for medical diagnosis;
- It is necessary for reasons of public interest in the area of public health (COVID-19);
- It is necessary for employment/social security purposes;
- It is necessary for research or statistical purposes e.g. to meet Government requirements, to monitor whether our equal opportunities policies are working and to ensure that disabled students and other under-represented groups receive appropriate support.

Should we require your consent for any specific use of your personal data, we will collect it in advance of any processing, and you can withdraw consent at any time. There are limited exceptions where consent cannot be withdrawn, for example, where your image has been published on printed material.

Purposes for which your personal information is used

The University holds the personal data and sensitive personal data / special category data of its students in order to implement and manage all services and processes relating to students, including student recruitment, admission, registration, teaching and learning, examination, graduation and other services such as accommodation, student support and careers. Only information required for these purposes is obtained and processed, and without it the University may not be able to provide its services. Information is passed between various sections of the University for operational reasons as is necessary and proportionate for intended purposes.

The purposes for which ATU may process your personal information include:

- Admission and Registration
- Academic purposes – teaching and learning, assessment, examination, remote proctoring, graduation, attendance, withdrawal, grievance and disciplinary issues
- Financial purposes – grants, fee collection, scholarships, prizes, bursaries, financial support

- To allow the deregistration process, including capturing reasons for withdrawal to allow the University to improve the overall student experience
- Provision of IT services
- Provision of Library services
- Provision of Student Support services, for example, Access, Disability, Learning Support, Chaplaincy, Counselling, Medical, Careers
- Identification e.g. ID cards, Moodle/Blackboard, class lists
- Mentorship
- Parking permits
- Access Cards
- To allow for the administration of Visas and registration of international students and administration of Springboard Students and RPL Students.
- Health & Safety
- Room occupancy tracking
- To communicate effectively with you by post, email and phone regarding your academic career. Occasionally, the University may have events, or information, which we believe may be of interest or benefit you and will be contacted by phone, email or post.
- CCTV purposes (as per CCTV policy)
- To support you in your studies by using information processed via Moodle / Blackboard to present a picture of your engagement and identify those who require additional support/specific services. The University also provides a Communications Learning Centre (CLC) and Maths Learning Centre (MLC), use of these services is voluntary and these services have their own privacy notices.
- To enable placements and apprenticeships
- To ensure academic standards are maintained
- To administer appeals, complaints, grievances, disciplinary matters and matters relating to conduct and cheating / plagiarism.
- Recruitment and Selection for paid positions e.g. Student Ambassador
- To comply with statutory reporting requirements and to provide information to organisations such as the HEA in line with legal and government requirements
- To enable the preparation and analysis of student statistics relating to registration, performance, progression and retention at sectoral level via THEA
- To administer voluntary surveys of student opinion about your experience and the performance of the University
- To administer the studentsurvey.ie, the survey for first and final year undergrad and taught postgrad students
- To arrange placements for you with employers
- To confirm the details of your academic achievements and for statistical and historical purposes, a core record of your studies is retained indefinitely.
- To allow your name to be included on our Graduation Booklet when you graduate from a University Programme.
- To enable research and archiving
- To produce reports and aggregate statistics for management and research purposes in order to plan and improve services
- To facilitate elections by the Students' Union
- To promote the University in print & electronic media
- To assist in the control and investigation of entitlements to any Social Welfare benefit or schemes
- To assist with law enforcement or where required or authorised by law and to provide information to organisations such as the HEA, Social Welfare, Revenue, SUSI, the Gardaí, in line with legal and government requirements

- To enable our continued contact with you after you complete your studies (e.g. survey of graduate work destinations, alumni networks, marketing, etc)
- To respond to requests for information made under Data Protection legislation or Freedom of Information legislation.

Additional processing may be required for students registered on specific programmes (e.g. teaching and social work) or with certain funding requirements or for students who choose to pursue studies abroad.

Third parties with whom we share your data

The University will share your personal data with third parties (outside ATU) in the following circumstances:

- Where we contract a third party to process data on our behalf, for example software service providers (e.g. Microsoft 365), plagiarism detection service provider, online proctoring provider, CCTV companies, etc., and
- Where the data is required to be shared as part of the normal course of performing the University's functions e.g.
 - Higher Education Authority (HEA)* Some of your information may be sent to the Higher Education Authority (HEA), or other regulatory bodies, where we are required to do so. Read the [HEA Data Collection Notice](#)
 - Quality and Qualifications Ireland (QQI)
 - Student Universal Support Ireland (SUSI)
 - Department of Employment Affairs and Social Protection (DEASP)/Department of Justice & Equality/INIS (international students)
 - Revenue Commissioners
 - Professional / Accreditation / Regulatory bodies (e.g. Engineers Ireland, Nursing and Midwifery Board of Ireland, the Veterinary Council of Ireland, the HSE, bodies for Nursing programmes.
 - THEA
 - Work placement providers
 - Other higher education institutions, partners or research organisations to which a student transfers or pursues an exchange programme or where a student's programme is being run collaboratively
 - Research funding bodies
 - Employers (students funded by employers) and Employers/Ibec Consortium Lead/Solas (Manufacturing Apprentices) and Recruitment Agencies for verification of attendance and for the provision of a reference.
 - Partner institutions/organisations for student transfers/exchanges/joint programmes
 - Garda Vetting Bureau
 - ATU Students' Union to facilitate student elections
 - Direct mail agencies/printing companies to facilitate the delivery of mailshots
 - Sponsors and other bodies providing prizes or funding to students
 - Prospective employers/recruitment companies for verification of qualifications
 - StudentSurvey.ie (the Irish Survey of Student Engagement)

- Other higher education institutions, partners or research organisations to which a student transfers or pursues an exchange programme or where a student's programme is being run collaboratively
- Insurance companies in respect of accidents occurring within the University
- An Garda Síochána to assist in the prevention or detection of crime
- Auditors
- Credit Card Providers
- Press/media
- Technological Higher Education Association (THEA), the representative body for Institutes of Technology and Technological Universities which supports our aims and objectives in numerous ways, including collating student data for statistical analysis. Individual students are not identifiable in reports which contain only anonymised collated data.

This is not an exhaustive list and any other disclosures to third parties not listed here are made only where there is legitimate reason to do so and in accordance with the law.

Parents, guardians and other relatives

It is your responsibility as a student to communicate and engage with the University. ATU will not disclose your data to parents or relatives without your consent (even if you're under 18 years), other than in exceptional circumstances, for example where there is potential danger to your health or well-being. If you wish to provide consent for matters to be discussed with your parent, you must send an email to this effect to the relevant ATU staff member. Exceptionally, where urgent communication with you has proved unfruitful, contact may be made with your next of kin/emergency contact using the details provided by you at registration.

Provision of Statistical Data to the HEA

ATU provides statistical data on the incidents of sexual violence, harassment, assault and rape to the HEA as part of ATU's reporting obligations under the national policy framework for ending sexual violence and harassment in HEIs. No personal data is shared as all data is aggregated and anonymised.

Publications

All graduating students, including those graduating in absentia, will have their name, home town, award and classification listed in the graduation booklet. The graduation ceremonies are streamed live on the internet and are recorded for publication on the internet and for archival purposes. Many ATU events are recorded and streamed/published on the ATU website.

Transfers outside the European Economic Area (EEA)

In so far as is practicable, ATU endeavours to hold all personal data within the EEA. In circumstances where data is transferred outside the EEA, we ensure that an appropriate mechanism exists for doing so that complies with all relevant legislation, for example:

- An adequacy decision granted by the European Commission, or
- European Commission Standard Contractual Clauses.

Data Retention

ATU retains your personal data for the purposes described in this notice. The University will not hold your data for any longer than is necessary, but some data will be held indefinitely in order, for example, to verify your award, provide transcripts, provide opportunities for further study, careers support, alumni and networking services. More information on our retention schedule is available on request by contacting dataprotection@atu.ie

Security

We are committed to ensuring that your personal data is secure with us and the data processors that act on our behalf.

Your Rights

You have the following rights under data protection law, although your ability to exercise these rights may be subject to certain conditions:

- The right to be informed about the data processing the University does
- The right to request access to your personal data held by the University – to have a copy of the personal data that we hold about you
- The right to rectification – to have inaccurate or incomplete personal data rectified
- The right to erasure of personal data where there is no legitimate reason for the University to continue to process your personal data. If you exercise this right, the University will continue to hold some personal data which, for graduates, will include name, subject(s) studied, graduation details, date of birth and unique identification number, so that we do not inadvertently contact you in the future and to maintain your education records for archive purposes. We may also continue to hold some financial records about you for statutory purposes
- The right to restrict the processing of personal data – you have the right to block the processing of your personal data in specific situations
- The right to data portability - you have the right to request that the University provides some elements of your information (e.g. academic progress records) in a commonly used machine-readable format in order to provide it to other organisations
- The right to object – you can object to the processing of your personal data by the University in certain circumstances, including the sending & receipt of direct marketing material
- The right to object to automated decision making & profiling. ATU does not currently make decisions affecting students by automatic means without human intervention.
- In order to exercise any of the above rights please contact us using the contact details set out below.

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Your Responsibilities

You must inform the University if your contact details change so that your data is accurate at all times. You must comply with ATU's Data Protection Policy which is available at <https://www.atu.ie/data-protection>.

Website Privacy Policy

The ATU website privacy policy explains how data is gathered through use of the ATU website.

How ATU will contact you

You may be contacted by telephone, email or post. In addition, we may text you with information related to your studies e.g. exam information, room changes, rescheduled classes, appointment reminders, placement arrangements, etc. This contact is to enable us to fulfil our contractual obligations to you.

Questions and Complaints

If you are not satisfied with the University's handling of your personal data or believe that the requirements of data protection legislation may not be fully complied with, you should contact the University's Data Protection Office in the first instance. You also have the right to submit a complaint to the Data Protection Commission.

How To Contact Us

Please contact us if you have any questions about the data, we hold about you or if you wish to exercise any of your rights. We work remotely and our contact details are:

Email: dataprotection@atu.ie

Tel: 091 742769

Changes to this Privacy Statement

We will update this privacy statement from time to time. Please visit this page periodically for updates. Updated on 12 August 2024.