



Estates & Facilities Privacy Statement

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').

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.

How personal data is processed

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
- Software used by Estates & Facilities
- CCTV
- Access Control System
- Safety, Security and Emergency Management Solution (SafeZone)
- Guard Tools Security Logs

The data collected as set out in this Privacy Statement will be shared (where relevant) with the following areas of the University: Human Resources, 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 College departments that have restricted access rights to College-controlled systems.

The purpose and legal basis for collecting personal data

Estates & Facilities 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. For the purposes outlined in this Privacy Statement, your personal data will be processed to support the statutory functions of the College.

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.

Legal basis for processing: Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Further information is available at: <https://www.tcd.ie/hr/privacy/>

Safety and Security

We collect personal data to provide a safe and secure environment at Trinity College for the Trinity Community. The personal data processed by College-controlled systems and solutions is processed for the specific and lawful purposes of maintaining campus security and complying with public health and safety guidelines, to ensure safety for the Trinity community and visitors and the provision of a safe campus environment for all.

CCTV cameras are in operation on campus in consultation with the Gardaí 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.

Legal basis for processing: 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.

Further information is available at:

- [Trinity College CCTV Policy](#)
- [Trinity College Access Control System Privacy Statement](#)
- [Trinity College SafeZone Overview](#)

How we store and secure personal data

Any personal data collected from you will be stored confidentially and securely as required by the [University Information Security Policy](#) and [Data Protection 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](#).

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 regular backups of important data.

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

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. CCTV, access control, intruder alarm logs, safety, security and emergency management solution.
- IT or Cloud service providers of work management systems.
- 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 materials.
- An Garda Síochána when required to do so by law.

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 which is processed by the System 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 without delay.

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 you believe the processing to be

disproportionate or unfair to you. Trinity College reserves the right to challenge any such request on the grounds that the processing is required, necessary and proportionate.

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 is 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.

Data Breach

Under GDPR a data 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. Further information is available at <https://www.tcd.ie/dataprotection/databreach/>.

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,
Dublin 2.
+353 1 896 4000

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

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 [raise a query](#) with the Data Protection Commission.

Date: July 2022