



Trinity Global Privacy Statement

Introduction

This is a statement of the practices of Trinity Global, Trinity College Dublin in connection with the processing of personal data and the steps taken by Trinity to safeguard individuals' rights to privacy and to protect personal data under data protection legislation, specifically the EU General Data Protection Regulation ("GDPR") and Data Protection Acts 1988-2018.

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

This Privacy Statement explains the following:

- How we collect your personal data.
- The purpose and legal basis for processing your personal data.
- How we securely store 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, from other systems under the control of Trinity College or by third parties associated with Trinity Global, including individuals with whom we communicate or interact with while providing our services, by email, telephone, completion of forms, surveys or otherwise.

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 is 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 Economic Area ("**EEA**") or external to 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 be processed by Trinity Global for the specific and lawful purposes as outlined in this Privacy Statement. We 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
Student recruitment activities both internationally and nationally, including but not limited to: Online webinars, online chat facilities, student recruitment agencies, university information facilitators, online register your interest forms, social media campaigns, lead generators, event participation or attendance (either virtual or in person), education fairs, email communication.	To promote Trinity College courses and services for student recruitment purposes and where necessary respond to student queries.	Article 6 (1)(e) Necessary to carry out the objects and functions under the University Act 1997.
Administration to support the provision of student services.	To provide reasonable student support to enhance student experience, offer support where applicable and advise / direct to appropriate service providers.	Article 6 (1)(e) Necessary to carry out the objects and functions under the University Act 1997. Article 6 (1) (c) Necessary for compliance with a legal obligation (Disability and Equality Legislation). Article 9 (2)(a)(c)(h)(i) (explicit consent, vital interest of the individual, provision of medical care/administration, public health).
Communicate with students and partner universities, and/or other representatives.	To provide students, both inbound and/or outbound with opportunities and support to study abroad.	Article 6 (1)(e) Necessary to carry out the objects and functions under the University Act 1997.
Preparation of testimonials in all formats, provided by registered students, alumni or provided by education agents/recruitment partners.	To promote Trinity College courses and services for student recruitment purposes.	Article 6 (1)(a) Consent.



Process	Purpose	Legal basis for processing under GDPR
Scholarship management and administration.	To develop and administer scholarships opportunities for students.	Article 6 (1)(e) Necessary to carry out the objects and functions under the University Act 1997.
Garda Vetting of Student Ambassadors/student helpers.	Legal requirement for all people working with individuals under 18 years of age.	Statutory Requirement.
Develop relationships, both internationally and nationally with universities, businesses, other institutions and Government Bodies.	To develop and promote Trinity College’s global profile, strategic partnership activities, global engagement activities, knowledge sharing and student recruitment.	Article 6 (1)(e) Necessary to carry out the objects and functions under the University Act 1997.
Develop relationships, both internationally and nationally with second level education representatives, third party recruitment partners and their referees, lead generators, college information facilitators.	To develop and promote relationships for student recruitment purposes and promote Trinity College courses.	Article 6 (1)(e) Necessary to carry out the objects and functions under the University Act 1997.
Arrange travel, accommodation, event participation and attendance.	To develop and promote Trinity College’s global academic profile, for academic and non-academic development and student recruitment purposes.	Article 6 (1)(e) Necessary to carry out the objects and functions under the University Act 1997.
Day to day administration of Trinity College business carried out by Trinity Global.	To carry out functions necessary for the running of College operations.	Article 6 (1)(e) Necessary to carry out the objects and functions under the University Act 1997.

For further information on personal data processing at Trinity College Dublin please see <https://www.tcd.ie/privacy/>.

Details of third parties with whom we share personal data

Trinity Global 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 Global will ensure that the data is processed according to specific instructions and that the same standards of confidentiality and security are maintained. The University will endeavour to only share data that is needed to meet stated objectives.



The following table details the third parties with whom your personal data is shared together with the purposes for the sharing:

External to Trinity College	
State or regulatory bodies including but not limited to: The Higher Education Authority, Department of Education and Skills, INIS, Department of Further and Higher Education, Research, Innovation and Science.	To provide support and associated student services and where required to do so by legislation.
Department of Justice.	To support visa applications for students.
Partner Universities / Other Universities / Higher Education Institutions.	Enhance academic opportunities for both academic staff and students and progress partnership development. General administration of potential / current students.
Study Abroad Agents / Education Agents / Recruitment agents / Second level education Counsellors and school administrators / Private Counsellors / Guardianship agencies or appointed guardians and all other parties involved in pre-registration and post registration processes.	General administration of potential / current students.
Funding Sponsor / Scholarship Partner e.g. Government of Ireland, China Scholarship Council, Claddagh, Fulbright, Global Excellence.	To promote and administer scholarships as appropriate.
Embassies.	Visa Assistance/ general administration / support of potential / current students.
Family member(s).	Please note that we cannot disclose your personal data or support needs at university unless you consent to disclose and have provided details to us.
Microsoft.	General administration using Microsoft Office 365.
Unibuddy.	Student support, Marketing and promotional activities.
Zoom, Skype, MS Teams.	Support, Marketing and promotional activities and communication activities.
Social Media e.g. Facebook, Twitter, WhatsApp, WeChat, Instagram, LinkedIn.	Support, Marketing, promotional and communication activities.



Eventbrite, Ticket Source and other event management systems.	Event management and promotion of services.
Visa First.	Visa and immigration services.
Club Travel.	Travel arrangements and accommodation.
Residential Accommodation Providers.	Accommodation and associated services.
Commercial Banks.	Payment of student stipends.
Staff and student survey providers / platforms including but not limited to i-Graduate (part of Tribal Group plc).	To provide feedback and survey results to enable decision making and planning.
Business partners, suppliers and subcontractors.	Performance of any contract to the University.
Internal to University	
Internal to other units in Trinity, including but not limited to: Human Resources, Academic Registry, Estates and Facilities, Accommodation Office, College Health Services, Disability Service, Student Counselling, Faculties/School/Department, E3, Senior Tutor's Office, Old Library/Book of Kells/Shop operator, Trinity Development and Alumni, Data Protection Office, Students Union.	For the purposes of student administration, residential accommodation services provided by Trinity and external accommodation service providers, where support and associated services to student is necessitated, provision of campus tours and visitor facilities, gathering testimonials, provision of services/support in unforeseen circumstances.

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 for a defined period of time in accordance with the Trinity College [Records Management Policy](#) or as defined below:

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 Data Subject Rights Requests Procedure - available [here](#).

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 website. Some cookies are essential so you can move around the website and use its features. Our website 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 for the purposes outlined above or if you wish to make a request in relation to your rights you can contact our office:

Professor Emma Stokes, Vice President for Global Engagement

VPGLOBAL@tcd.ie

If you wish to make a complaint or escalate an issue relating to your rights you can contact the Trinity College Data Protection Officer:

Data Protection Officer
Secretary's Office,
Trinity College Dublin,
Dublin 2,
Ireland.

dataprotection@tcd.ie

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 Data Protection Commissioner 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 College staff who are processing personal data on behalf of the University as part of their employment duties.

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