



Trinity Research and Innovation Privacy Notice

Introduction

This is a statement of the practices of Trinity Research and Innovation ('TR&I') in connection with the processing of personal data for the purposes of our services and the steps taken by Trinity College Dublin as a data controller to safeguard individuals' rights under data protection legislation, specifically the EU General Data Protection Regulation ('GDPR') and Data Protection Acts 1988-2018.

Trinity College Dublin actively seeks to preserve the privacy rights of data subjects who share personal data with the University. Any personal information which you provide to TR&I will be treated with the highest standards of security and confidentiality, in accordance with data protection legislation.

This Privacy Notice 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 from third parties including individuals with whom we communicate or interact with in the course of providing our services, by email, telephone, completion of forms, surveys or otherwise.

Purpose and legal basis for processing personal data

The personal data we collect from you will only be processed by TR&I for the specific and lawful purposes as outlined in this Privacy Notice. Trinity College 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.



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Specifically, your personal data may be processed for any or all of the following purposes:

Process	Purpose	Legal basis for processing under GDPR
Invention Disclosure Form Management.	To capture the Intellectual Property (IP) of TCD employee or transfer of IP to TCD.	Article 6(1)(e) 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.
Patent Management.	To meet the legal requirements of Intellectual Property Offices and Patent Offices worldwide when registering IP or filing a patent.	Article 6(1)(c) processing is necessary for compliance with a legal obligation to which the controller is subject.
Entering, negotiating and completing Non-Disclosure Agreements (NDAs) and contracts.	To process this data in order to enter into legal agreements and pre-negotiations for legal agreements.	Article 6(1)(b) 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.
Entering, negotiating and completing Material Transfer Agreements and Data Transfer Agreements.	To process this data in order to enter into legal agreements and pre-negotiations for legal agreements.	Article 6(1)(b) 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.
Business Development Management.	To enable the successful commercialisation of research.	Article 6(1)(b) 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.
Licensing Agreements.	To enter into legal agreements and pre-negotiations for legal agreements that govern the transfer of Intellectual Property into and out of TCD.	Article 6(1)(b) 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.
Licensing Revenue Distribution.	To distribute revenue to TCD inventors.	Article 6(1)(b) 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.
Campus Company Formation.	To enter into shareholder and subscription agreements.	Article 6(1)(b) processing is necessary for the performance of a contract to which



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		the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
Applications for research funding.	To request research funding from the relevant funding bodies.	<p>Article 6(1)(b) 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.</p> <p>Article 9(2)(g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.</p>
Marketing/Events/Website Users.	Promotion of services.	Article 6(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

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

Trinity Research and Innovation has compiled processing records, in accordance with Article 30 GDPR requirements. If you require further detail please contact dweldon@tcd.ie.

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 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 External Area ('EE') or external of the EEA which are compliant with Chapter V GDPR requirements.



Details of third parties with whom we share personal data

Trinity Research and Innovation will only share your data with third parties where necessary for the purposes of processing outlined in this Privacy Notice. In accordance with Article 28 GDPR, when we share your data with third parties TR&I will ensure that the data is processed according to specific instructions and that the same standards of confidentiality and security are maintained.

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

Inteum/RPAMS/ SUGAR.	Intellectual Property Document Management System, Data base providers/ Customer Relationship Management.
Professional service providers such as Patent Agents, Patent Offices, legal firms, auditors, Research and academic partners.	To secure legal protection for inventions, legal advice, meet legislative obligations.
Business partners, suppliers and sub-contractors.	Performance of any contract to the University.
Research and Innovation Funding Bodies e.g. Enterprise Ireland, EU Commission.	Research Funding.
Microsoft.	Administration.

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 Notice we will store your data in accordance with the Trinity College [Records Management Policy](#).

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 TR&I and to exercise that right easily and at reasonable intervals.



Consent

You may withdraw your consent to TR&I processing your personal data at any time, when consent is the legal basis for the processing. To withdraw your consent, we require you to advise TR&I in writing.

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 the Trinity College website [Cookie Register](#). You can refuse or consent to third party cookies when you first visit our website or by following the guidelines in the Trinity College website [Cookie Policy](#).

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 our office at: dweldon@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:

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: 15/03/2021.