

# The USP-University Skills Passport Privacy Notice

## Introduction

This is a statement of the practices of the University of Galway in connection with the processing of personal data for the purposes of the USP- University Skills Passport and the steps taken by the University of Galway, as a data controller to safeguard individuals' rights under data protection legislation, specifically the EU General Data Protection Regulation and Data Protection Acts 1988-2018.

The University of Galway fully respects your right to privacy and actively seeks to preserve the privacy rights of data subjects who share personal data with the University. Any personal information within the USP application will be treated with the highest standards of security and confidentiality, in accordance with data protection legislation.

This Privacy Statement explains the following

- How the USP collects 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

The USP will collect data about your registration, engagement with activities and graduation status in order to process your individual skills passport. This data will be collected directly from our student records system and achievement reports from the various co/extra-curricular activity providers you engage with in the University of Galway. This solution supports student engagement, personal development and employability.

Taking part is voluntary. You can decide to take part or not in the USP initiative. There will be no consequences for you if you decide not to participate. Once compiled, you will have full control over whether to share your USP or not.

## Purpose and legal basis for processing personal data

The personal data we collect from you will only be processed by the USP application for the specific and lawful purposes as outlined in this Privacy Statement. University of Galway 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 by the USP application for any or all of the following purposes:

<b>Process</b>	<b>Purpose</b>	<b>Legal basis for processing under GDPR</b>
The Creation of the USP - University Skills Passport	<p>The USP application will bring together in one place a report on what skills you have developed either in curriculum or in an co/extra-curricular context. In this way, it creates a rich picture for you to consciously choose opportunities for further development.</p> <p>The USP will be issued to you on graduation in addition to your academic transcript and parchment etc.</p>	A public task: for example, to complete official functions or tasks in the public interest. This would include for example fulfilling the objects and functions as set out in the Universities Act 1997
USP Reporting	By utilising anonymised reports, the university will be able to track engagement levels and skills profiles of the student body, providing useful data for programme review and development.	A public task: for example, to complete official functions or tasks in the public interest. This would include for example fulfilling the objects and functions as set out in the Universities Act 1997
Involvement in extra-curricular activities data	The USP will receive a report of the activities you have engaged in across both the curriculum and extracurricular community as evidence of your engagement in university life	Consent through sign up with individual activity owners and course modules

Only the system administrator and the student can access an individual's skills passport. The University has compiled processing records, in accordance with Article 30 GDPR requirements. If you require further detail please contact USP@universityofgalway.ie.

Data collected through the USP process will not be used for the purposes of research.

How we securely store your personal data

Personal data will be stored confidentially and securely as required by the University of Galway [QA 401 Data Handling](#) and [QA400 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 (“**EEA**”) or external of the EEA which are subject to Chapter V GDPR requirements.

Details of third parties with whom we share personal data

The USP 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 the USP application 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:

AMOS	System Administrator USP
Digitary	University’s Agent for Producing Digital Credentials

### **Links to other websites**

Our website may contain links to and details of other websites that are outside our control and are not covered by this Privacy Notice. You will have full control over whether to share your USP with other websites or not. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours. It will be helpful for you to read their Privacy Policy before providing them with your personal data.

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 in accordance with the University of Galway QA 442 University of Galway Records Retention Policy and QA 442 Record Retention Schedule(see policy document also).

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 University of Galway [Data Subject Rights Procedure](#).

### **Right of Access**

You have the right to request a copy of the personal data which is processed by the USP and to exercise that right easily and at reasonable intervals.

### **Consent**

You may withdraw your consent to the 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 this 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 detailed further at [Cookies and Tracking](#)

[Technology](#). You can refuse or consent to third party cookies when you first visit our website.

#### 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 [USP@Universityofgalway.ie](mailto:USP@Universityofgalway.ie)

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

Email: [dataprotection@nuigalway.ie](mailto:dataprotection@nuigalway.ie)

Post:

The Data Protection Officer,  
University of Galway, Room A129,  
The Quadrangle,  
University of Galway,  
University Road,  
Galway

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 University of Galway is processing your data you can make a complaint to the Data Protection Commissioner at: <https://www.dataprotection.ie/en/individuals/exercising-your-rights/complaints-handling-investigations-and-enforcement-individuals>

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 University of Galway, 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 USP staff who are processing personal data on behalf of the University as part of their employment duties.

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