

## Policy Identifier: MIE Privacy Statement

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<b>Policy Title:</b>	MIE Privacy Statement
<b>Description:</b>	This policy outlines how MIE will collect and process personal information in order to carry out its statutory, academic and administrative functions.
<b>Author (Position):</b>	Vice President (Academic Affairs) and Registrar
<b>Version:</b>	1
<b>Approved By:</b>	MIE Governing Body
<b>Policy Approval Date:</b>	January 2019
<b>Date of Next Policy Review:</b>	April 2023 (or as necessary)

# MIE Privacy Statement

## 1 Context

Who are we?

- 1.1 Marino Institute of Education (MIE) is a teaching, learning and research community committed to promoting inclusion and excellence in education, with its address at Griffith Avenue, Dublin 9, Ireland. The association with Trinity College Dublin, the University of Dublin (hereafter referred to as Trinity) has led the Institute to formalise an agreement which places MIE under the joint trusteeship of the Congregation of Christian Brothers European Province and Trinity.
- 1.2 Pursuant to [Article 6 1\(b\) Lawful Processing of General Data Protection Regulation](#) (GDPR), which provides a lawful basis for the processing of personal data to the extent that “processing is necessary for the performance of a contract to which the data subject is party or in order to take the steps at the request of the data subject prior to entering into a contract”, MIE will collect and process personal information in order to carry out its statutory, academic and administrative functions. Such information may relate to many categories of people, which include the students and staff of MIE.
- 1.3 This Privacy Statement explains how MIE processes information, particularly personal data received from students, employees and other stakeholders. Please read the following carefully to understand MIE’s approach and practices regarding personal data and other information and how MIE treats it. People are advised not to use the [MIE website](#), [Moodle](#), email, products or services if they do not agree with the ways in which MIE will process personal data and other information.
- 1.4 MIE is not responsible for the content or privacy practices of other websites which may be accessed through the [MIE website](#). It is MIE’s policy to clearly identify links to external websites, and it is users’ responsibility to satisfy themselves as to the adequacy of the practices of such linked sites. MIE's policy regarding the use of web resources may be inspected in the [MIE IT Acceptable Use Policy](#).

## 2 Purpose

- 2.1 What personal Information does MIE collect?

Depending on the particular circumstances, MIE may collect and hold a range of different information. This can include name, gender, age, date of birth, photograph, address,

phone number, email address, mobile phone number, nationality, PPS number, medical data, disability, socio-economic status data, and financial information (such as bank account and grant details). This list is not exhaustive and MIE may sometimes need to collect additional information for registration purposes for example, including academic results, references, or for supporting student appeals etc.

### **3 How Does MIE Collect Information?**

MIE may collect and process information about you in a number of ways, including:

- 3.1 Directly from you, or through people contacting the Institute with a request, complaint or query;
- 3.2 When people visit [MIE's website](#) or [Moodle](#) virtual learning environment, where relevant information includes, but is not limited to, traffic data, location data, weblogs and other communication data and any resources that are accessed;
- 3.3 From third parties, such as related colleges or referees;
- 3.4 From [MIE records](#) of how you use MIE products or services; and
- 3.5 From publicly available sources of information.

### **4 What Does MIE Use Personal Information For?**

MIE uses personal information for a range of different purposes, including:

- 4.1 To determine suitability for MIE courses and other services;
- 4.2 To administer and manage the courses and services MIE provides, to charge for them, and to process payment and collect any amounts owed to MIE;
- 4.3 To provide information requested from MIE about courses and services;
- 4.4 To assist people with enquiries and to provide better customer service;
- 4.5 To notify people about changes to courses and services which are acquired from MIE or which are otherwise subscribed to;
- 4.6 To carry on the Institute's arrangement with Trinity, the designated awarding body;
- 4.7 To conduct research and analysis to further enhance and improve the quality of the courses and services MIE offers. MIE endeavours to ensure that MIE de-personalises any personal data before using such data for research and development purposes; and

- 4.8 To comply with any law applicable to us or arising from other people's or entities' interaction with the Institute.
- 4.9 To offer services provided by third parties related to studies with MIE;
- 4.10 To comply with requests for information by bodies such as, but not limited to, [The Teaching Council](#), [The Department of Education and Skills](#), [Student Universal Support Ireland \(SUSI\)](#) and the [Higher Education Authority \(HEA\)](#).

## 5 How does MIE share personal information?

- 5.1 Any information which is provided in this way is made available only to third parties for which consent has been granted and is used by MIE only in accordance with the purpose for which the information was provided and will be retained only for as long as required for the purpose. By submitting personal data, people agree to this transfer, storing or processing of their personal data by MIE. In addition, MIE may disclose information to its regulators and where necessary to Trinity. MIE will not share, sell or distribute personal information to third parties for advertising or marketing products or services without the person's consent. MIE may share information with analytics and search engine providers that assist MIE in the improvement and optimisation of its website. An individual can withdraw consent for MIE to share, sell or distribute personal information to third parties at any time.
- 5.2 Where permitted by law, MIE reserves the right to release personal data without consent and/or without consulting with the person, when MIE believes that this is appropriate to comply with its legal obligations, to protect the security of the website and related technologies, to prevent and minimise the effects of fraud, and otherwise to protect the Institute's legitimate interests and/or the legitimate interests of its partners or stakeholders.
- 5.3 **Payroll Processing Update November 2020:** The payroll processing function at MIE transitioned to the Higher Education Payroll Shared Services (HEPSS) In November 2020. MIE remains the Data Controller and the HEPSS are the Data Processor. For more information about how the Education Shared Business Services (ESBS) processes data, please see the [ESBS' Privacy Statement here](#).

## 6 Where do we store personal information?

- 6.1 We may store personal information in hard copy or electronic format, in storage facilities which we own and operate ourselves, or that are owned and operated by service providers within the European Economic Area (EEA).
- 6.2 It is possible that some of the personal information held may be transferred to, and stored at, a destination outside the EEA which may not provide the same level of protection as within the EEA. It may also be processed by personnel operating outside the EEA who work for us, one of MIE's service providers or someone else. Any such transfers of personal data outside the EEA will comply with the requirements of the [Data Processing Agreement](#). By submitting personal data, people agree to this transfer, storing or processing.

## 7 For How Long do we Retain Personal Data?

We retain personal data for as long as is necessary with regard to the purposes for which it was collected or lawfully further processed, or for as long as may be necessary in light of MIE's legal obligations. A detailed schedule<sup>1</sup> for data retention is available on request.

## 8 How does MIE Keep Personal Information Safe and Accurate?

- 8.1 MIE will take all steps deemed to be reasonably necessary to ensure that personal information is treated securely and in accordance with this Privacy Statement. MIE seeks to ensure that it keeps personal data accurate and up to date. However, the data owner is responsible for informing the Institute of any changes to their personal data and other information (such as a change in contact details).
- 8.2 While MIE takes these steps to maintain the security of people's information, people should be aware of the many information security risks that exist and take appropriate care to help safeguard their information. The nature of the internet is such that MIE cannot guarantee the security of the information transmitted to the Institute electronically, and any transmission is at the sender's own risk. MIE stores information provided on secure servers and deploys appropriate technical and organisational security measures in the storage and disclosure of personal data to try to prevent unauthorised access or loss.

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<sup>1</sup>[MIE Records Retention Schedule](#) and [Document Retention Policy](#)

## 9 What are People's Rights?

- 9.1 People have rights under the [Data Protection Legislation, 2018](#). They have the right to ask MIE not to process their personal data for marketing purposes. MIE will usually inform people (before collecting personal data) if it intends to use personal data for such purposes or if the Institute intends to disclose information to any third party for such purposes.
- 9.2 People also have the right to access information held about them by submitting a Subject Access request form or by emailing [dataprotection@mie.ie](mailto:dataprotection@mie.ie), and to request that MIE updates, corrects or deletes any inaccuracies in personal data. People may also submit a request that MIE ceases processing personal data, which will be reviewed by the Data Protection Officer.
- 9.3 People can exercise any of their rights under GDPR at any time by contacting [dataprotection@mie.ie](mailto:dataprotection@mie.ie).

## 10 Research and Personal Data

The [Data Protection Act, 2018](#) provides certain exemptions for data collected, held and processed for research purposes (including historical and statistical purposes). If the purpose of the data processing is other than to take measures or make decisions which are targeted at particular individuals, and it does not cause substantial distress or damage, it:

- 10.1 Can be processed for purposes other than that for which it was collected, provided that it is still only a research purpose;
- 10.2 Can be held indefinitely; and
- 10.3 Is exempt from the data subject's right of access (where the data is processed for research purpose only)

The results of the research or statistics derived from the research should not be made available in a form which identifies the individuals concerned.

Personal data provided or used for research purposes does not have a blanket exemption from the [Data Protection Act, 2018](#). Researchers wishing to use personal data should be aware that the [Data Protection Act, 2018](#) will still apply.

## 11 CCTV on the MIE Campus

- 11.1 [CCTV](#) is located throughout the campus grounds. This is necessary in order to protect against theft, damage to property and for the safety and security of staff, students and visitors of MIE.
- 11.2 Access to recorded material is strictly limited to authorised personnel. The images captured are retained for 14-30 days, depending on activity levels, except when the images identify an issue and are retained specifically in the context of an investigation of that issue. [CCTV](#) footage may be entered as evidence in the event of [disciplinary proceedings](#) involving staff, students or others. [CCTV](#) footage is not disclosed to any third party except An Garda Síochána in the case of a disclosure pursuant to the [Data Protection Act, 2018](#). For information on [CCTV](#) operations at MIE please contact the Director of Conferencing and Facilities.

## 12 Changes to the MIE Privacy Statement

Any changes MIE may make to the MIE Privacy Statement in the future will be, where appropriate, notified to relevant people by email. Please check back frequently to see any updates or changes to this Privacy Statement.

## 13 Contacting us

If anyone has any questions, comments and requests regarding this Privacy Statement they should address all correspondence to the GDPR Compliance and Quality Administrator or the [Registrar's Office](#), Marino Institute of Education, Griffith Avenue, Dublin 9 or please contact [dataprotection@mie.ie](mailto:dataprotection@mie.ie).

## 14 Related Documents

- 14.1 [Article 6 1\(b\) Lawful Processing of General Data Protection Regulation](#)
- 14.2 [Data Protection Legislation, 2018](#)
- 14.3 [Data Protection Act, 2018](#)
- 14.4 [MIE IT Acceptable Use Policy](#)
- 14.5 [MIE GDPR Data Processing Agreement with External Examiners](#)
- 14.6 [MIE Data Protection Statement and CCTV Policy](#)
- 14.7 [MIE Disciplinary Policy](#)

14.8 [MIE Records Retention Schedule](#)

14.9 [Document Retention Policy](#)