



# Access Control System Privacy Statement

## Introduction

This Privacy Statement concerns the Trinity College Dublin Access Control System (“**the System**”) in connection with the processing of personal data for the purposes of the System and the steps taken by Trinity College Dublin (“**Trinity College**” / “**the University**”) 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 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 data which is processed by the System will be treated with the highest standards of security and confidentiality in compliance with data protection legislation.

This Privacy Statement explains the following:

- How Trinity College collects your personal data
- The purpose and legal basis for processing your personal data
- How Trinity College securely stores your personal data
- Details of third parties with whom Trinity College shares personal data
- Your rights under data protection legislation

## How Trinity College processes personal data

We collect personal data to provide a safe and secure environment at Trinity College for the Trinity Community. Data processed by the System is collected from other secure systems under the control of Trinity College. Only the minimum and necessary amount of personal data is processed for the purposes of the System.

## Purpose and legal basis for processing personal data

Trinity College ensures that your data is processed fairly and lawfully in keeping with the principles of data protection as set out under Article 5 GDPR.

The personal data processed by the System is processed for the specific and lawful purposes of space use and utilisation planning, maintaining campus security and compliance with public health guidelines, to ensure a safe, efficient and productive environment for the Trinity community and visitors. These purposes are achieved by managing and providing access to Trinity-controlled estates and restricted areas within the estate to authorised individuals only.

The System is supported by other relevant College-controlled systems, including CCTV and the SafeZone safety, security and emergency management solution for these purposes. In certain instances and under strict control measures data may be cross-checked between systems to ensure adherence to College Policies and Procedures and protect the safety and wellbeing of individuals.

Data from the System is not used for any other purpose, for example; to evaluate the performance or attendance of individuals.

A Data Protection Impact Assessment has been carried out on the System, in compliance with Article 35 GDPR, in order to review and mitigate potential data protection risks associated with the processing of personal data via the System.

The legal basis for processing personal data in this instance is:

Article 6(1)(e) GDPR: 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 SafeZone Overview](#)

### **How Trinity College securely stores your personal data**

Personal data is 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 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 External Area (“**EEA**”) or external of the EEA which are subject to Chapter V GDPR requirements.

### **Details of third parties with whom Trinity College shares personal data**

Trinity College 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 College ensures that the data is processed according to specific instructions and that the same standards of confidentiality and security are maintained at all times.

### **How long Trinity College retains 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 purpose of providing services relevant to Trinity College requirements and 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 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; or
- 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.

### **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 the Campus Security Manager at:

Estates & Facilities Service Centre  
194 Pearse St  
Trinity College  
Dublin 2

[estatesandfacilities@tcd.ie](mailto:estatesandfacilities@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

[dataprotection@tcd.ie](mailto: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 raise a query with the Data Protection Commission at: <https://forms.dataprotection.ie/contact>.

**Date: July 2023**