



DATA PRIVACY STATEMENT

Introduction

Campus Life Services is committed to protecting your personal information by processing it responsibly and safeguarding it using appropriate technical, administrative and physical security measures.

The privacy notice below explains what information we gather about you, what we use that information for and to whom we give the information. It also sets out your rights and who you can contact for more information or queries.

Information about you which we process

Your personal data is obtained directly from you. Specifically:

1. We may collect record and use information about you in physical and electronic form and will hold, use and otherwise process the data in accordance with the Data Protection Legislation and as set out in this notice.

2. In the course of providing services to you or communicating with you regarding possible services we might provide, we may collect or obtain personal data about you. We may also collect personal data from you when you use this Website and booking engines to avail of our services.

3. We may collect or obtain such data because you give it to us (for example when booking a room on campus), and or because other people give that data to us (for example University of Limerick administration departments) or third party service providers that we use to help operate our business or because it is publicly available.

4. We may also collect or obtain personal data from you because we observe or infer that data about you from the way you interact with us or others. For example, to improve your experience when you use this Website and ensure that it is functioning effectively, we (or our service providers) may use **cookies** (small text files stored in a user's browser) and Web beacons which may collect personal data.

5. The personal data that we may collect or obtain may include:

- Your name, gender, age and date of birth;
- Your contact information, such as your address and contact details (including your email and mobile telephone number);
- Country of residence;
- UL ID number and/or CAO application number
- Your credit card details and bank account details for the purposes of payment
- Your room sharing preferences
- Dietary requirements and any special needs and requests you may have during your stay with us
- Your postings on any social media applications and services that we provide;
- Your IP address, your browser type and language, your access times; complaint details;
- Details of how you use our products and services.

6. Personal data we collect from you may also include sensitive information or 'special categories' of personal data, such as details about your dietary requirements (attending a conference lunch/dinner);

health (allergens so that we can make reasonable accommodation for your requests), mobility requirements in the case of special needs access.

7. Where we are provided with personal data about you by another third party (E.g. University of Limerick administration), we take steps to ensure that the client or other third party has complied with the data protection laws and regulations relevant to that information; this may include, for example, that the client or other third party has provided you with notice of the collection (and other matters) and has obtained any necessary consent for us to process that information as described in this privacy notice.

8. If you fail to provide us with this information, or you object to us processing such the consequences are that we may be prevented from processing your special requests or continuing to provide all or some of our services to you or our customer.

How we use information about you

The personal data we hold process and retain will be used for the management of your student/guest account, for administrative purposes, for meeting our legal and regulatory obligations and for marketing. We hold it and use it to protect your rights and interests and to manage our relationship with you appropriately, effectively and lawfully. At the same time, it enables us to run our operation.

This includes using your personal data to enable us to manage your bookings/licence/transaction, comply with our legal obligations and pursue our legitimate interests.

Sharing and transferring your personal data

We will disclose information about you to other third parties only in the event where a contracted service is required to fulfil your service requirements. As outlined above, we take steps to ensure that the contracted third party has complied with the data protection laws and regulations relevant to that information. Specifically, Campus Life Services shares data with:

1. Kinetic Solutions: management of our online booking software and IT support
2. Global Payments (formerly Realex Payments) to process your debit/credit card on behalf of Campus Life Services. Global Payments fully comply with the PCI/DSS 3.2 security requirements.
3. Google Analytics to measure the traffic on the Campus Life Services website. See here for an overview of privacy at Google: (EU-US Privacy Shield and <https://support.google.com/analytics/answer/6004245>)
4. Social Media - Audiences are set up on Campus Life Services social media accounts where we market and promote our services and facilities.
5. Google AdWords - Google AdWords' system is based on cookies and keywords determined by advertisers. Google uses these characteristics to place Campus Life Services on pages where they think it might be relevant. Campus Life Services pays when users divert their browsing to click on our advertising campaigns.
7. University contracted services such as licenced Campus Security and Campus Catering operations.
6. In case of a complaint, the information may be shared with organisations who provide services to the company such as legal advisors.

The legal grounds we use for processing your personal data

We are required by law to set out in this data privacy notice the legal grounds on which we rely in order to process your personal data. We rely on one or more of the following lawful grounds:

1. You have explicitly agreed to us processing your information in order to avail of our facilities and services.
2. The processing of your personal data is necessary in order for us to fulfil the terms of the contractual agreement we have with you or to take steps to enter into an such agreements with you
3. The processing of your personal data is necessary for compliance with a legal obligation we have such as keeping records for tax purposes or providing information to a public body or law enforcement agency
4. Direct marketing to you about UL services, facilities and special offers or areas of interest where you have given consent to receive such information unless you have indicated at any time that you do not wish to do so. Opt in and Opt out facilities will be included in all such communications

Protection of your personal data

Campus Life Services use a range of physical and electronic measures to ensure that we keep your personal data secure, accurate and up to date. These measures include:

- Education and training to relevant management and staff to ensure they are aware of our data protection obligations when processing of personal data;
- Administrative and technical controls to restrict access to personal data;
- Technological security measures, including fire walls, encryption and anti-virus software; and
- Physical security measures, such as coded storage safes and locked filing cabinets.

Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

How long we keep your information for

Campus Life Services will only keep the personal data we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

We will hold your personal data on our systems for the longest of the following periods: (i) as long as is necessary for the relevant activity or services; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise in respect of the services.

Your rights

You have the following rights under data protection law, in particular you have the right to:

- 1. Information Request.** The right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data.
- 2. Update Data.** The right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update your data such that it is complete.
- 3. Data Deletion.** The right, in certain circumstances, to request that we erase your personal data.

4. Restrict Processing. The right to object to our use of your personal data or the way in which we process it.

5. Object to Processing. The right, in certain circumstances, to request that we no longer process your personal data for particular purposes.

6. Data Portability. The right, in certain circumstances, to transfer your personal data to another organisation.

7. Review Automated Decisions. The right to object to automated decision making and/or profiling.

8. Opt out of communications. To ask us to stop sending you marketing or promotion messages at any time by following the unsubscribe instructions in our communications

9. File a Complaint. You have the right to complain to the Data Protection Commissioner. You also have the ability to complain to us via our contact details outlined below

Right to complain

If you wish to exercise any of the rights relating to your information set out above, or if you have any questions or comments about privacy issues, or you wish to raise a complaint about how we are using your information you can write to: The Data Controller, Campus Life Services, D0033 – University of Limerick, Castletroy, Limerick or send an email to cls@ul.ie

If you have any concerns about our use of your information, you also have the right to make a complaint to the Office of the Data Protection Commissioner (www.dataprotection.ie).

Changes to this privacy notice

We may modify or amend this privacy notice from time to time.

If you wish to contact us

If you have any questions or comments about privacy issues or wish to exercise any of the rights set out above please write to The Data Controller, Plassey Campus Centre, D0033 University of Limerick, Castletroy, Limerick or email cls@ul.ie