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## Privacy Policy

### 1. Policy Overview

This policy outlines the guidelines for ensuring the privacy of website users is assured as it pertains to the College's compliance with GDPR legislation. The policy comes under the College's overarching GDPR policy, UPOL020 UniHaven Data Protection Policy Rev 1.

### 2. Policy Statement

www.unihaven.ie is the website of UniHaven Limited and is the College website. This means that UniHaven is the "Data controller" of this website. The College operate this website for two key purposes, Communication and eCommerce. The College uses the lawful bases of consent, legal obligation, and legitimate interests for processing personal data. A limited number of third parties are used that process personal data either directly on the website or indirectly through external links to the service provider's own webpage. The College will never knowingly engage in any practices that will bring harm to a user through their interaction with this website. The College asks users to read this Privacy Policy and related Cookie policy in full before engaging with the website and to send any questions or concerns about this policy to [dpo@unihaven.ie](mailto:dpo@unihaven.ie).

#### **Communication**

The website is used to communicate information. The College also operates the website to enable users to communicate with the College and with each other. This may also include for marketing purposes if this is per the user's chosen marketing preferences. Also, the College has a presence on social media platforms such as Facebook, Instagram, Linked In, and Twitter.



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## eCommerce

The College uses the website to offer products and services and to collect student fee payments via third-party provider links.

The College commits to

- Operating to the highest standards of practice.
- Keep the privacy of users at the forefront of design and operation.
- Only collecting minimal personal data.
- Only using trusted third-party services.
- Reviewing and reflecting to ensure security is appropriate and adequate.
- Never knowingly causing harm by misusing personal data.

### 3. Roles and Responsibilities

The College's Data Protection Officer (DPO) is the owner of this policy, but the Chief Revenue Officer is responsible for its implementation for the benefit of website users such as students, their families and stakeholders. The Academic Director is responsible for ensuring that policies are developed and maintained, that they remain fit for purpose, that they remain in compliance with QQI guidelines, that they are updated as per agreed schedules, and that they are being implemented as intended. In the latter context, the Academic Director will inspect a sample of policies each year to check for the correct implementation and bring the findings to AC as part of the annual QA/QQI review and reporting process.

### 4. Policy

#### Data Collection

The College collects a minimal amount of personal data through the website. The table below shows the personal data collected, why it is collected, the lawful basis under GDPR and additional information that may be of use.

<b>Type of Personal Data</b>	<b>Lawful Basis</b>	<b>Why collected</b>	<b>Additional Information</b>
Contact information such as name and email	Consent	Subscription for the newsletter	This service is operated through MailerLite. Users can unsubscribe at any time.
Contact information such as name and email	Consent	Direct Marketing	This service is operated through MailerLite. Users can unsubscribe at any time.
Contact information such as name and email	Consent	For posting comments and in response to news items or articles	This service is operated through Tawk.to.
Contact information and payment information	Consent	For enrolling in programmes	This service is operated through Transfermate.
IP address from which you accessed the website, the pages you visit, information about your device type, operating system type and browser type.	You must consent first through the cookie banner	To help us understand how users interact with the website	This information is anonymous. This information is gathered through Google Analytics. See the Cookie Policy.
Aggregated information about UniHaven newsletters – e.g. have they been opened, have links been clicked, aggregated forward to friends	Legitimate Interests	To help us understand the performance of the newsletters	This information is gathered through a web beacon that MailerLite places on newsletters and not directly through the website.

### **Third-Party Service Providers**

The College uses third-party service providers on the website. The College recommend that users read the Privacy and Cookie Policies of these service providers. Where appropriate, the College has Data Processing Agreements with, or clauses included in the terms of services for, the chosen providers.



The College and/or the third-party partners may use the personal information users send for marketing purposes if this is per user marketing preferences. The College uses web beacons to learn more about the devices communications subscribers use. The College also tracks email or newsletter subscribers' movements from opening an email through to the website. Users can opt out of marketing emails at any time. See the College Cookie Policy for how marketing cookies are managed.

Many of these third-party services are international organisations. As such, they may transfer personal data outside the EU/EEA. For more information on how these services manage international data transfers, please review their respective privacy policies.

The table below provides information about the service, why the College is using it, additional information about it, and links to their respective Privacy and Cookie notices. Please be aware that when users click these links, they are leaving the College website and the College has no control over how these third-party websites may use personal data or cookies.

<b>Name of service</b>	<b>Reason for use</b>	<b>If I do not want this service, what can I do?</b>	<b>Additional Information</b>	<b>Link to Service Privacy and Cookie Policy</b>
Wordpress	This is the software used for the website	It cannot be turned off.	See <a href="#">Security   WordPress.org</a> for more information about the core software security	<a href="#">Wordpress Privacy Policy</a>  <a href="#">WordPress Cookie Policy</a>
Convera	This is the payments software option.	Users can unsubscribe and opt-out at any time		<a href="#">Convera Privacy Policy</a>  <a href="#">Convera Cookie Policy</a>
MailerLite	This service enables us to manage the newsletter and email marketing lists	Users can unsubscribe and opt-out at any time		<a href="#">MailerLite Privacy Policy</a>  <a href="#">MailerLite Cookie Policy</a>



## Social Media

The College has a presence on social media platforms such as LinkedIn, Instagram, Facebook, and Twitter and uses Vimeo for video recordings. These accounts are used to post information such as notices about staff, college information and programmes. These accounts are not monitored. Users need to be aware that any responses to content on these social media platforms are done so through users own choice, at their own risk and without expectation of privacy. This should be noted as the College is not able to control how other users on these platforms may act.

The table below lists the social media account platforms with links to their respective privacy and cookie notices. The College advises users to read these policies in advance of using their services. Please be aware that when users click these links, they are leaving the College website and that the College has no control over these third-party websites use of personal data or cookies.

Social Media Platform	Links to Policies
LinkedIn	<a href="#">LinkedIn Privacy Policy</a> <a href="#">LinkedIn Cookie Policy</a>
Facebook	<a href="#">Facebook Privacy Policy</a>
Instagram	<a href="#">Instagram Privacy Policy</a>
Twitter	<a href="#">Twitter Privacy Policy</a> <a href="#">Twitter Cookie Policy</a>
YouTube	<a href="#">Google Privacy Policy</a>
Vimeo	<a href="#">Vimeo Privacy Policy</a> <a href="#">Vimeo Cookie Policy</a>

## Information Security

The website processes a small amount of personal data. However, the College takes its duty to protect this data very seriously and has in place technical and organisational safeguards to



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do this proportionate to the size and scope and nature of the personal data processing. If users become aware of something that gives concern about the security of their personal data, they should contact [dpo@unihaven.ie](mailto:dpo@unihaven.ie).

## User Rights

The College is committed to ensuring that the rights and freedoms of website users are respected and that as data subjects that users are enabled to exercise these rights. Under GDPR, users have rights including:

- **Right of access** - the right to ask the College for copies of personal information.
- **Right to rectification** - the right to ask the College to rectify information users think is inaccurate. Users also have the right to ask the College to complete information they think is incomplete.
- **Right to erasure** - the right to ask the College to erase personal information in certain circumstances.
- **Right to restriction of processing** - the right to ask the College to restrict the processing of information in certain circumstances.
- **Right to object to processing** - the right to object to the processing of personal data in certain circumstances.
- **Right to data portability** - the right to ask the College to transfer the information given to it to another organisation, or users, in certain circumstances.

Users are not required to pay any charge for exercising their rights. If users make a request, the College has 30 calendar days in which to respond.

## Right to Complain

The College hope that users do not need to complain, but if they do, please contact the College first at [dpo@unihaven.ie](mailto:dpo@unihaven.ie) and hopefully the College will be able to resolve it fairly and amicably. Users also have the right to complain to the Supervisory Authority:

DATA PROTECTION COMMISSION



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21 FITZWILLIAM SQUARE SOUTH

DUBLIN 2

D02 RD28

IRELAND

Ph: [+353 \(0\)761 104 800](tel:+353(0)761104800)

Ph: [+353 \(0\)57 868 4800](tel:+353(0)578684800)

Users also have the right to a judicial review. Please see [www.dataprotection.ie](http://www.dataprotection.ie) for more information.

## 5. Procedures and Forms

The policy should be read with the following policies and procedures:

- UPOL020 UniHaven Data Protection Policy Rev 1.
- UPOL022 UniHaven Cookie Policy Rev 1.
- UPRO012 UniHaven Data Subject Access Request Procedure Rev 1.
- UPRO013 UniHaven Data Security Breach and Reporting Procedure Rev 1.



**Quality Assurance Manual (QAM) Chapter 9**

<b>Quality Assurance Manual (QAM) Chapter 9</b>	
<b>Document Name</b>	Privacy Policy
<b>Policy Document Number</b>	UPOL021
<b>Version Reference</b>	Rev.1
<b>Document Owner</b>	Academic Director
<b>Roles with Aligned Responsibility</b>	Executive management team, all staff
<b>Approved By</b>	Academic Council (AC)
<b>Approval Date</b>	3.2.2023
<b>Date Policy Becomes Active</b>	1.4.2023
<b>Revision Cycle</b>	Annually
<b>Revision History/Amalgamation History</b>	Revised for text errors post programme validation
<b>Additional Information</b>	N/A
<b>References/ Supporting Documentation</b>	<p>UDOC000 UniHaven Quality Assurance Manual Rev 2</p> <p>Statutory Quality Assurance Guidelines developed by QQI for use by all Providers (2016)</p> <p>Statutory Quality Assurance Guidelines developed by QQI for Independent/Private Providers coming to QQI on a Voluntary Basis (2016)</p> <p>The Data Protection Acts 1988 and 2003 (as amended)</p> <p>Data Protection Legislation including Article 5 guidelines on (GDPR) General Privacy Data Regulations</p> <p>UPOL020 UniHaven Data Protection Policy Rev 1</p> <p>UPOL022 UniHaven Cookie Policy Rev 1</p> <p>UPOL023 UniHaven Data Retention Policy Rev 1</p> <p>UPOL024 UniHaven Data Security Policy Rev 1</p>