



TCDSU Privacy Policy

Last Updated 25 May 2023

Our Commitment to You

At TCD Students' Union, your privacy is a top priority. It is at the core of the representative services we provide to our members and the relationships we have with external parties.

We appreciate that you put your trust in us — we do not take this lightly.

The personal data which you provide to TCD Students' Union (TCDSU) is processed in compliance with Irish and European Data Protection legislation, specifically the General Data Protection Regulation (EU) 2016/679 ('GDPR') and the Data Protection Act 2018, and in accordance with this privacy policy which explains the following:

1. Who We Are	1
2. Where This Privacy Policy Applies	1
3. Data Protection Officer	1
4. Data You Give Us	1
5. How We Use Your Data	2
6. Why Can We Collect and Use Your Data?	4
7. Who We Share Your Data With	5
8. Data Retention	6
9. Your Privacy Rights	6
10. Data Protection Commission (DPC)	7
11. Privacy Policy Changes	7
12. How to Contact Us	7

If you have any questions, you can contact the TCDSU Data Protection Officer at dataprotection@tcdsu.org

1. Who We Are

Throughout this privacy policy, “we” “us” and “ours” refers to TCD Students’ Union which is the sole representative body for students of Trinity College Dublin, and is recognised as such by the Board of Trinity College and the Council of the University of Dublin. It operates from Teach a Sé, Regent House, Trinity College Dublin, Dublin 2, Ireland, D02 FD37.

We are the organisation that controls your data known as the “data controller” under data protection law. We can be contacted by email at frontoffice@tcdsu.org or by phone at +353-1-6468-431

2. Where This Privacy Policy Applies

This Privacy Policy applies to the services, events, and campaigns operated by TCD Students’ Union. For simplicity, we refer to all of these as our “services” in this Privacy Policy.

3. Data Protection Officer

We have appointed an internal Data Protection Officer (DPO) for you to contact if you have any questions regarding this privacy policy, our privacy practices or if you wish to exercise your data rights. They can be reached by email at dataprotection@tcdsu.org

4. Data You Give Us

This privacy policy sets out how your data is processed, i.e. collected, used, shared, and stored.

When providing our services we may ask for information that identifies you as a person, i.e. the “data subject”, such as your name, student number, email, etc. This is known as your “Personal Data”. It will sometimes be necessary for TCDSU to ask you for additional “Special Category Data” such as gender identity or financial status. For example, according to the TCDSU Constitution, only union members who identify as lesbian, gay, bisexual or transgender (LGBT) can run for the position of LGBT Rights Officer. We will always process Special Category Data in compliance with [GDPR Article 9](#).

5. How We Use Your Data

Purpose for processing data

A. Student Casework

When you contact a TCDSU Officer, any personal information you choose to include in your communications is used by that TCDSU Officer to respond to your query. For the purpose of reference, we retain your correspondence. If absolutely necessary for the protection of vital interests, we may need to share that information ([see Section 7.2](#)).

B. Welfare Initiatives

When you use the TCDSU services listed below, you will be asked to provide personal information via application forms and/or website registration forms. This is used to deliver the service you requested, and for the purpose of financial reporting:

- Accommodation Advisory Service
- Drug-Testing Kits
- Emergency Food Vouchers Scheme
- International Fund
- Laptop Loan Scheme
- Short-Term Welfare Loan
- Transition Fund

C. Front Office

When you contact the SU Front Office to ask a question, the data you provide is used by TCDSU to respond to your query. When you order a Student Leapcard/ISIC Card via SU Front Office, the data you provide is used for identity verification and printing the card. When you engage with an SU Front Office initiative such as the 1937 Locker Rentals or Postgraduate Common Room Bookings, the data you provide is used to administer locker rentals or contact you regarding your booking.

Legal basis for processing

- Consent
- Vital interests

- Consent
- Statutory requirements

- Consent

D. Employment and Third-Party Contracts

TCDSU periodically advertises job openings. When you apply for a job, the personal information you provide in your application is used to administer the recruitment process. If you become party to an employment contract, TCDSU will collect and retain the information necessary to fulfil the terms of the contract.

TCDSU may also be party to contracts with third-party service providers ([see Section 7.1](#)).

- Performance of a contract

D. Elections and Governance

When you register your details to run for or vote in a TCDSU election, you provide us with data such as your name, contact information, current year/area of study, and manifesto. This is used to administer the election process, to communicate with successful candidates during their term in office, and to administer governance bodies such as Council, Union Forum, and Committees of Council.

- Consent

E. Events

When you reserve a ticket for a Trinity Ents event, the data you provide is used by Trinity Ents to run the event and to contact ticket holders about the event if appropriate.

- Consent

F. Competitions, Surveys, & Social Media

When you choose to participate in our promotions or contests, the information that you give us to enter is used to administer the contest, e.g. select and contact the winner. When you participate in surveys, you give us your insights into our services, responses to our questions and testimonials which are then used for the purpose stated in the survey. If you contact us via a @tcdsu social media account, that account stores the information you give us during the interaction.

- Consent
- Legitimate interests

G. Legal Obligations

TCDSU may have a legal right or duty to use or disclose your information to fulfil its statutory requirements, and to exercise or defend legal claims.

- Statutory requirements
- Legitimate interests

6. Why Can We Collect and Use Your Data?

In order for our use of personal data to be lawful, it must be processed on the basis of a legal basis as set out under [GDPR Article 6](#) and [Article 9](#). These may include:

6.1. Consent

When you decide to contact TCDSU via email or other means, you give consent to the processing of your data for the specific purpose stated in your communication. For example, if an individual emails the Education Officer regarding an exam deferral, the information provided is used for the specific purpose of assisting the individual through the deferral, and cannot be used to contact them about marketing promotions. If TCDSU intends to use the data for any other purposes to the one stated, we will ask for separate consent before processing.

You have the right to withdraw consent at any time ([see Section 9](#)).

6.2. Performance of a Contract

We also process information if it is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract. This includes employee contracts, as well as contracts TCDSU may have with third-party service providers.

6.3. Statutory Requirements

It may be necessary for us to evidence our compliance with applicable laws and regulations. We retain data about financial transactions in line with our accounting, tax and other statutory data retention obligations and to be able to respond to valid access requests from law enforcement. We also keep information that proves consent you have given us and decisions you may have taken to opt-out of data processing.

6.4. Vital Interests

TCDSU may process data if it is necessary in order to protect the life of the data subject or of another individual.

6.5. Legitimate Interests

We also process your information if it is necessary for the purposes of our legitimate interest. For example, we may collect information on our services to review and improve our services, or where necessary to enforce our rights, assist law enforcement and enable us to defend ourselves in the event of a legal action. In some cases, this basis may be overridden by your individual interests, rights or freedoms as a data subject.

7. Who We Share Your Data With

7.1. Administrative and Legal Purposes

TCDSU will only share your data with third parties where necessary for purposes of the processing and where there is a legal basis to do so:

- **An Garda Síochana:** Statutory requirements.
- **Auditors, Legal Firms:** Statutory requirements.
- **Bank of Ireland, An Post, Eleavon, Payzone, Sum Up, Thesaurus:** Payment purposes.
- **Credit Card Systems Ireland Ltd:** LeapCard issuance and identity verification.
- **Eventbrite, Fixr:** Running events.
- **EVIABI, Mi-Voice:** Conducting online election processes.
- **GoDaddy:** Website hosting and login registration.
- **Google:** Internal/external communications and data storage.
- **Timetastic:** Administering staff leave.

TCDSU will endeavour only to share the data that is needed, that the data is only processed according to our specific instructions and that the same standards of confidentiality and security are maintained.

Once the processing is complete, any third parties with whom data was shared will be required to return the data to TCDSU save where they are required to retain it by law.

7.2. Welfare Concerns

Appropriate information sharing is an essential part of the provision of safe and effective support. Our primary duty is to respect the confidential nature of the information you share with us.

However, there are some limits to this. For example, if a TCDSU Officer is worried about your life or the life of someone around you, they may need to seek advice from appropriate bodies such as the TCD Student Counselling Service or the Office of the Junior Dean. In this event, disclosure will be kept to the minimum necessary for the purpose.

7.4. Other Third Parties

TCDSU will not disclose your personal data to any third party, except as set out above. We will never sell or rent our service users' data to other organisations for marketing purposes.

8. Data Retention

TCDSU Students' Union will only store data for as long as is necessary for the specific purposes for which it was collected, or until you exercise your privacy rights under the General Data Protection Regulation (EU) 2016/679 ('GDPR') and the Data Protection Act 2018 ([see section 9](#)).

In certain cases, we may retain information on the basis of our legitimate interest where there is an outstanding or potential issue, claim or dispute requiring us to keep information. In particular if we receive a valid legal subpoena or request asking us to preserve data, in which case we would need to keep the data to comply with our legal obligations or if data would otherwise be necessary as part of legal proceedings.

9. Your Privacy Rights

Individuals are entitled to certain privacy rights under the law. It is important to note that these Rights are not absolute, and may be subject to certain exceptions as set out under GDPR and the Data Protection Act 2018. To exercise your rights, please follow these procedures:

9.1. Right of Access

You have the right to request a copy of the personal data we are processing about you and to exercise that right easily and at reasonable intervals ([Article 15](#)).

9.2 Right to Erasure

The right to erasure – also known as the right to be forgotten – allows a data subject to stop all processing of their data and request their personal data be erased ([Article 17](#)).

- **1)** Complete the [Data Access Request Form](#) or the [Data Erasure Request Form](#). To help TCDSU to respond to a request, individuals should be as specific as possible about the information sought. Any additional details that assist to locate the information, for example; names of relevant officers, relevant time periods, etc. will be most useful in processing the request in a compliant manner.
- **2)** Email it to the TCDSU Data Protection Officer at dataprotection@tcdsu.org with proof of identity attached (e.g. a copy of your passport, drivers licence or staff/student ID card).
- **3)** Responses to requests will be issued within one month unless an extension is required.

9.2. Right to Withdraw Consent; To Rectification; To Restrict Processing; To Object

You have the right to withdraw your consent where that is the legal basis of our processing ([Article 7](#)). Individuals have the right to request rectification of their personal data, including the correction or errors and the updating of incomplete information ([Article 16](#)). You may also have the right to restrict processing in certain circumstances ([Article 18](#)). If a request to stop data processing is rejected by a data controller, the data subject has the right to object to their Article 18 right being denied ([Article 21](#)).

- **1)** To exercise the rights set out in Section 9.2, submit a written request via email to dataprotection@tcdsu.org with proof of identity attached (e.g. a copy of your passport, drivers licence or staff/student ID card).
- **2)** Responses to requests will be issued within one month unless an extension is required.

It is important to note that these rights are not absolute. In certain situations, TCDSU may not be able to accommodate a request. For example, if it would interfere with the provision of a service that you have asked TCDSU to provide you with. You will be notified if this is the case.

10. Data Protection Commission (DPC)

If you are not satisfied with the information we have provided to you in relation to the processing of your data you can raise a concern with the Data Protection Commission [via their online form](#) or contact the Commission at: dataprotection.ie

11. Privacy Policy Changes

We will always strive to keep explanations about our data practices up-to-date, so this policy may be reviewed and changed over time. An updated version will always be made available on the www.tcdsu.org website.

12. How to Contact Us

If you have questions about this Privacy Policy, you can contact the TCDSU Data Protection Officer at dataprotection@tcdsu.org