

SafePod Network



SAFEPOD[®]

S E C U R E D A T A A C C E S S

SafePod Network Privacy Notice

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Version control

Updates to this document will be summarised in the table below.

Version No.	Date	Section	Update
1.	23.02.21	Throughout document	Updated document with information about unsuccessful registrations.
1.3	29.04.21	3.6 and 3.7	Amendment to third party provider and retention periods.
1.4	31.05.21	Throughout document	Minor text updates and amendments.
1.5	01.06.21	Throughout document	Minor text updates and amendments.
1.6	03.06.21	Throughout document	Minor text updates and amendments.
1.7	16.07.21	Throughout document	Added information about SPN enquiries.
1.8	02.08.21	3.11	Statement on use of Processors added.

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1. Definitions

- **Advisory Board:** a group of representatives from Swansea University, the University of Edinburgh, University of Essex, and the University of St Andrews, who are responsible for the long term objectives of the SafePod Network.
- **Data Centre:** an organisation which has agreed to provide access to their datasets from a SafePod.
- **SafePod:** SPN prefabricated safe setting that provides the physical security and necessary controls for secure access to datasets.
- **SafePod Network (SPN):** the service which provides an independent UK network of standardised safe settings for use by researchers, SafePod Organisations and Data Centres.
- **SafePod Organisation:** an organisation that has purchased and installed a SafePod.
- **SPN User:** a person that uses a SafePod and other SPN services, this is typically either a researcher or a person supporting a researcher.
- **SPN User registration:** the information that must be supplied by a person together with acceptance of the terms to become a member of the SPN.
- **SPN services:** services provided by the SPN to assist with and enable access to datasets for research.
- **University:** The University of St Andrews.

2. Document application

This document provides information on how personal data are used throughout the SafePod Network. This document will be updated as and when required.

Contact the SPN User Support Service for further information on this document.

3. SPN Privacy Notice

3.1. How the University will make use of personal data

The University operates and manages the SPN, which has been set up to provide services to enable researchers to access datasets provided by Data Centres for research purposes in the UK. Dataset access will primarily be by using SafePods. As part of providing these services, the SPN will collect and use personal data from individuals who use SPN services, and from individuals at organisations that support the SPN. Members of the public can also sign up to receive SPN news and events items.

Data Centres that join the SPN will also collect and use personal data when:

- Working with a SPN User, when agreeing how access to datasets is to be provided;
- Approving SafePod bookings;
- They require a booked SafePod session to be recorded by CCTV; and
- They require to understand whether a SPN User has or has not met the terms of their dataset access agreement.

For all the above reasons the associated Data Centre is the Controller. They will need to provide a relevant privacy notice and data protection rights to individuals.

3.1.1. SPN Users

The University will collect personal details to:

- Register a person as a SPN User;
- Manage the SPN User registration process;
- Maintain records of successful and unsuccessful applications for registration as a SPN User;
- Manage SafePod bookings;
- Manage other SPN services provided to researchers;
- Understand whether the terms and conditions of dataset access, SafePod use and other SPN services were upheld; and
- Provide key aggregated and anonymised statistics about the SPN to funders and other stakeholders.

3.1.2. Data Centre and SafePod Organisation personnel

The University will collect personal details from Data Centre and SafePod Organisation personnel for SPN services to be provided to SPN Users, for example for the notification, cancellation and management of SafePod bookings.

If so wished, Data Centre and SafePod Organisation employees and contractors can provide the University with their consent for their contact details to be used to advise about SPN news and events. Consent can be withdrawn at any time.

3.1.3. Contractors

The University will collect personal details from contractors for SPN registration purposes. Contractors must agree to the SPN terms and conditions before any required work can be carried out on SPN products.

If so wished, contractors can provide the University with their consent, for their contact details to be used to advise about SPN news and events. Consent can be withdrawn at any time.

3.1.4 Members of the public

The University will collect personal details from members of the public to provide information to them about SPN news and events. Consent can be withdrawn at any time.

Individuals may make enquires of the SPN. Personal details received will be used to respond to those enquiries.

3.2. The identity and the contact details of the data controller

University of St Andrews, College Gate, North Street, St Andrews, KY16 9AJ, Fife, Scotland, UK. The University is a charity registered in Scotland, No SC013532.

3.3. The contact details of the University Data Protection Officer

Mr Christopher Milne, Head of Information Assurance and Governance, University of St Andrews, Email dataprot@st-andrews.ac.uk.

3.4. The purposes for which the University will make use of personal data

3.4.1. Administration for a SPN User

Personal data is primarily used by the University to set-up and administer a SPN User's registration and for the management of SafePod bookings and other services provided by the SPN. This information will be shared between Data Centres and SafePod Organisations as needed, which will involve creating a unique user record. The personal data collected will include name, email address, telephone number, affiliated organisation and booking details.

The use of a SafePod and other services provided by the SPN is subject to the terms and conditions agreed between the University and the individual.

CCTV footage of a SafePod booked session or other services provided by the SPN may be used by the SPN to help determine whether the terms of the SPN User Agreement have been upheld.

The use of a Data Centre's dataset(s) is subject to terms and conditions agreed between the Data Centre and the individual.

If there are reasonable grounds to suspect that an individual has not upheld the agreed terms and conditions with a Data Centre and/or the University, their personal data which may include CCTV footage may be used by either of the aforementioned parties to understand if the said terms and conditions have been met or otherwise.

If a breach of SPN User Agreement has been established, details of that may be shared with relevant parties – the parties with whom details may be shared are set out in the SPN User Agreement.

Where an application for registration as a SPN User was not successful, records of that application will be maintained and may be cross referenced against future applications.

Personal data may also be anonymised and aggregated for the provision of statistics about the SPN to funders and other stakeholders.

Personal data will also be shared with the Advisory Board when priority access to a SafePod is requested, and those applications need to be considered and a decision made.

3.4.2. Administration for Data Centre and SafePod Organisation personnel

Personal details for Data Centre and SafePod Organisation personnel will be used to enable SafePod bookings to be confirmed or declined, administer other SPN services where appropriate and for the management of security incidents. This will involve creating a unique user record. The personal data collected will include name, email address, telephone number and affiliated organisation.

These details will be provided by the University and will be made available to SPN Users, Data Centres and SafePod Organisations for those purposes as relevant. A Data Centre and a SafePod Organisation may use a SPN User's contact details to also advise of changes to SafePod booking arrangements or other SPN services where appropriate.

Personal data may also be anonymised and aggregated for the provision of statistics about the SPN to funders and other stakeholders.

3.4.3. Administration for contractors

Personal details for contractors will be used by the University to set-up and administer their SPN registration to repair or maintain a SafePod. This will involve creating a unique user record. The personal data collected will include name, email address, and affiliated organisation.

3.4.4. SPN news and events

Any person can consent for their contact details to be used by the University to advise about SPN news, events and other SPN materials. Consent can be withdrawn at any time by replying to a SPN email with the subject line 'Opt out of SPN updates' or by contacting safepodnetwork@st-andrews.ac.uk.

3.4.5. Improving SPN services

If a person provides the SPN with feedback about the SPN, then the University may use that information to improve SPN services.

3.5. The lawful bases for processing personal data

For setting up an individual's registration with the SPN and the management of SafePod bookings and other SPN services between SPN Users, Data Centres and SafePod Organisations, the lawful basis for processing personal data is contract.

Where the University needs to establish if a SPN User has or has not upheld the terms of the SPN User Agreement then personal data, including CCTV footage may be used. The lawful basis being contract.

For providing information about the SPN News and events, the lawful basis is consent.

In other instances, notably where an employee of a SafePod Organisation or a contractor is recorded on CCTV when entering a SafePod, the lawful basis for capturing those personal data is legitimate interests. For the avoidance of doubt, the University is the Controller of those personal data.

3.6. CCTV and SafePod bookings Personal data

The University uses third party suppliers to provide CCTV services and a managed booking system via the SPN website. The University of St Andrews has contracts with those providers, which establishes the roles and responsibilities for the protection and use of personal data, which meets the requirements of data protection law.

The University will make use of SPN User Registration details and CCTV footage to assess whether an individual has or has not upheld their SPN User Agreement. Where a breach of the SPN User Agreement has been established, the associated personal data may be shared with the parties listed in the SPN User Agreement.

The University may transfer SPN User registration details, CCTV footage and other personal data held to a Data Centre, where it is necessary to establish if a SPN User has or has not upheld their dataset agreement with them. CCTV footage may also be transferred to other organisations where there is a lawful basis to do so.

3.7. The period for which personal data will be stored, or if that is not possible, the criteria used to determine that period

Registration records

For SPN Users, the University will retain personal details and the SPN booking data for a period of 6 years after the last booking for a SafePod or other SPN service for accessing datasets, after which time records will be destroyed.

For Data Centre and SafePod Organisation personnel, registrations will be reviewed on an annual basis and destroyed if no longer active.

For contractors, registrations will be reviewed on an annual basis and destroyed after three years where the contractor has not completed any SafePod repair or maintenance work.

For members of the public, registrations will be destroyed upon request or if the SPN is no longer operational, whatever is the earliest.

Records of an unsuccessful application for registration as a SPN User, SafePod Organisation personnel, Data Centre personnel or contractor will be retained for 3 years, before being destroyed.

CCTV footage

CCTV footage will normally be held for 30 days before being deleted. However, where footage is exported at the request of a Data Centre or to review suspected misuse of a SafePod then this will be held for longer.

Enquiries

Details of any enquiries received to the SPN will be destroyed at the end of the University's financial year following the year in which those enquiries were received.

3.8. Rights available to individuals

UK data protection laws provides individuals with rights regarding the management of their personal data. In relation to the SPN, the rights are:

The right of access to personal data, commonly referred to as a subject access request, which involves the following being carried out within a calendar month:

- Confirmation that personal data is being processed;
- Access being given to a person's personal data (provision of a copy), unless an exemption(s) applies; and
- The provision of supplementary information e.g. an explanation of how personal data is processed and who this is shared with.

The right to rectification, which may involve:

- The University working to correct any inaccuracies in personal data or to address any omissions, which may require personal data to be annotated to acknowledge that this is incomplete.

The right to data portability, which may involve:

- The University providing a copy of elements of personal data that exist in machine readable form that have been given to the University.

These rights must be met by the University and any other organisation that takes decisions about how or why your personal data is used. Details on how to access those rights are available from the University website, or you can contact dataprot@st-andrews.ac.uk.

If the University receives a request from an individual for a data protection right and the University is not the Controller i.e. not responsible for providing that right, the request will be passed to the appropriate organisation, within 2 working days.

3.9. The right to lodge a complaint with a supervisory authority

If you believe that the University has not made use of your personal data, in line with the requirements of the law, you have the right to raise this with the regulator i.e. the UK Information Commissioner Office's ("the ICO"). However, you must raise the matter with the University first.

Details on how to contact the ICO are available online from their website.

3.10. Contractual requirement to provide personal data and the consequence where no personal data are provided for SPN users

In order for the SPN to provide services to an individual (mainly SafePod bookings), SPN Users must provide their contact details for registration purposes, to process SafePod bookings and for the management of other SPN services that maybe used. Without an individual providing these personal details, then SPN services cannot be provided to them.

3.11. Who we may share personal data with

Personal data are shared with third party Processors who provide services to the SafePod Network under contract for CCTV, booking and email services. Details of the providers of those services are available on request.

3.12. Revision of the Privacy Notice

This Privacy Notice will be reviewed at regular intervals. The review period will be approved by the University and recorded in the version control section of this document. Any significant change to relevant legislation, University policy or procedures primarily concerned with the protection of personal data may trigger an earlier review.

3.13. Availability

This Privacy Notice will be published on the SPN website.

Should a copy of this Privacy Notice be required in another form, including orally i.e. an audio recording, please contact safepodnetwork@st-andrews.ac.uk.

4. Contact information

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