



Privacy Notice - Poll Everywhere

1 WHY WE USE POLL EVERYWHERE AS A LEARNING TOOL?

Poll Everywhere is a real time student response system that is available to all staff in UCD. Staff create polls within Poll Everywhere and share with their students via a URL.

2 LEGAL BASIS FOR PROCESSING PERSONAL DATA

The legal basis for UCD to process your personal data under the GDPR using Poll Everywhere is 'public task', as participation in the polling is a core requirement of educational programmes in UCD.

3 WHAT INFORMATION WE SHARE WITH Poll Everywhere?

The following minimum, mandatory information is shared with Poll Everywhere in order for you to access your account: 'UCD Connect Username', 'UCD email', and 'Full name'.

4 HOW LONG WE KEEP YOUR DATA?

Students: The minimum, mandatory personal data which you share with peerScholar will be retained for no longer than 1 Trimester after you cease to be a student at UCD and your account is terminated.

Staff: The minimum, mandatory personal data which is shared with Poll Everywhere will be retained until the point that your UCD IT Account becomes disabled.

5 HOW WE PROTECT YOUR DATA?

UCD has advanced IT Security measures in place to protect the integrity and confidentiality of the personal data you share with Poll Everywhere. Please ensure you take care to protect the confidentiality of your UCD Connect user log in details including username and password to protect your account through Brightspace.

6 SHARING YOUR DATA OUTSIDE UCD

Your Poll Everywhere personal data is processed securely on servers outside the European Economic Area (EEA) in the USA. Under Article 49 of the GDPR, by using Poll Everywhere you are explicitly consenting to the transfer of your personal data outside of the EEA. The level of data protections afforded by law in the USA are lesser than the protections guaranteed in the EEA. A cloud computing IT security assessment, a personal data Transfer Adequacy Assessment and Standard Contractual Clauses have been put in place between UCD and Poll Everywhere to protect the security of your data.

YOUR DATA PRIVACY RIGHTS

7 RIGHT TO ACCESS

You have a right to make a Subject Access request in relation to the information which UCD and Collaborate Ultra are processing as part of your account. Information on submitting a Subject Access Request under the GDPR is available from the [UCD Freedom of information Unit](https://www.ucd.ie/dataprotection/request.htm) at: <https://www.ucd.ie/dataprotection/request.htm>

- Right of Access: You have the right to know what type of personal data UCD holds about you and to obtain a copy of this data.
- Right of Erasure: Under certain circumstances, GDPR allows you to have personal data erased. We will assess whether it is possible to implement such a request but please be aware that UCD will need to retain certain information about you in order to carry out our lawful functions

- Right to Object: Under certain circumstances, you can object to the processing of your personal data
- Right to Portability: Under certain circumstances, you have the right to request that we provide elements of your data in a commonly used, machine-readable format
- Right to Rectification: You have the right to have any inaccurate personal data which we hold about you updated or corrected
- Right to Restriction: You have the right to block the processing of your personal data in certain circumstances. We will assess whether it is possible to implement such a request
- Automated Decision-Making: You have the right to object to automated individual decision-making (i.e. making a decision solely by automated means without any human involvement) and profiling (i.e. automated processing of personal data to evaluate certain things about an individual). UCD does not make any decisions about students using wholly automated means

8 RIGHT TO RECTIFICATION

If you ever identify any inaccurate data which is recorded on your Poll Everywhere account, you have a right to request that your record is updated for accuracy.

9 RIGHT TO LODGE A COMPLAINT

a) UCD IT Services

If you have any concerns in relation to how your personal data is being processed by UCD and Poll Everywhere we would appreciate it if you could contact UCD IT Services as a first port of call to discuss any concerns about the protection of your privacy rights by logging a call via www.ucd.ie/ithelp and selecting "Get Help".

b) UCD Data Protection Officer (DPO)

You also have a right to report any concerns you have in relation to the processing of your personal data under Collaborate Ultra to the UCD DPO by emailing gdpr@ucd.ie.

c) Data Protection Commission (DPC)

Finally, you have the right to lodge a complaint with the Supervisory Authority, in Ireland the Data Protection Commission (DPC) if you have serious concerns that your rights as a data subject under the GDPR have been infringed. However, we really wish to help, and would encourage you to contact IT Services with any initial concerns. Details of how to lodge a complaint can be found on the DPC [Website](http://www.dpc.ie).

Version History

Date	Version Control	Approved by
02 Feb 2021	Finalised draft of PN	T. Mountjoy, UCD IT Services
10 Feb 2021	Amended to include staff data	T. Mountjoy, UCD IT Services
19 Mar 2021	Formatting	T. Mountjoy, UCD IT Services
10 Nov 2021	Changed IT Help Desk references	T. Mountjoy, UCD IT Services