



UCD LINKEDIN LEARNING PRIVACY NOTICE 2020-21

1. ABOUT THIS PRIVACY NOTICE & PURPOSE OF PROCESSING PERSONAL DATA

LinkedIn Learning is an online learning service that provides access to a large range of courses and tutorials taught by industry experts in categories including information technology, creative and business skills.

UCD is providing access to the LinkedIn Learning platform to all permanent and temporary employees as a pilot project in the academic year 2020-21. This new innovative training option will enhance employee learning and development and contribute to organisational learning.

This Privacy Notice refers to the personal data which UCD will share as the data controller with LinkedIn Learning to provide employees with this new service.

2. LAWFUL BASIS FOR PROCESSING PERSONAL DATA

If you participate in LinkedIn Learning as a UCD employee, the lawful basis which the University uses to process your personal data under the GDPR is "legitimate interest".

3. RECIPIENTS OF THE PERSONAL DATA

The limited amount of personal data on your UCD LinkedIn Learning account will be shared with the LinkedIn Corporation and UCD HR.

As the range of courses on the platform extends beyond HR related training content, and so that the platform can be fully utilised across the University to support development, limited access will also be granted to a small number of UCD colleagues outside of HR. Primarily these will be colleagues in Schools and Units who provide training to UCD employees e.g. IT training.

4. CATEGORIES OF PERSONAL DATA SHARED WITH LINKEDIN LEARNING

a) UCD LinkedIn Learning Account

In order to access LinkedIn Learning as a UCD employee, the University will share the following mandatory data identifiers with LinkedIn: 'name' & 'UCD email address'.

UCD is the data controller of this limited personal data which is shared with LinkedIn Learning as the data processor.

b) Personal LinkedIn Profile account

Your UCD LinkedIn Learning Account is separate to any other LinkedIn account you may hold as a personal user. You will be given the option to connect your personal LinkedIn profile during activation of UCD LinkedIn Learning.

If you choose to connect your LinkedIn profile with your LinkedIn Learning account, then you will receive additional benefits such as personalised content recommendations based on your LinkedIn profile information.

Connecting accounts is completely optional and those wishing to use UCD LinkedIn Learning without owning or connecting a LinkedIn profile can do so without issue. Accounts can also be disconnected at any time.

This UCD Privacy Policy only applies to the specific personal data which you share as a UCD employee on your LinkedIn Learning account.

c) Additional personal data shared with UCD, if you decide to link your UCD LinkedIn Learning account with a personal LinkedIn Profile account

If you decide to link the two accounts, UCD will receive the following additional information related to your personal Profile account from LinkedIn corporation:

- LinkedIn Profile information, such as work title, and profile photo which are already available through LinkedIn.com
- Any courses that the learner has transferred to their UCD LinkedIn Learning account



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5. USER AGREEMENT

Before you use the UCD LinkedIn Learning service, you must accept the [User Agreement](#) through which you are agreeing to enter into a legally binding contract with LinkedIn. Your use of the service is also subject to LinkedIn's [Cookie Policy](#) and [Privacy Policy](#) which covers how they collect, use, share and store your personal information.

6. HOW YOUR INFORMATION WILL BE USED

Within the University this information may be used for analytics pertaining to courses and reporting usage rates of the UCD LinkedIn Learning service.

7. DETAILS OF TRANSFERS OF THE PERSONAL DATA TO ANY THIRD COUNTRY OR INTERNATIONAL ORGANISATION OUTSIDE THE EUROPEAN ECONOMIC AREA

Your UCD LinkedIn Learning data is securely stored on LinkedIn servers outside the European Economic Area (EEA) in the USA and Singapore. Under Article 49 of the GDPR, by setting up a UCD LinkedIn Learning account 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 and Singapore are lesser than the protections guaranteed in the EEA, under the GDPR. A cloud computing security assessment, a personal data Transfer Adequacy Assessment and Standard Contractual Clauses have been put in place between UCD and LinkedIn Learning to protect the privacy and security of your data. You can find out more about this in [Section 5: Other Important Information in the LinkedIn Privacy Policy](#).

8. RETENTION PERIODS FOR PERSONAL DATA

a) UCD LinkedIn Learning Retention Period

LinkedIn will retain your UCD employee personal data for as long as the UCD LinkedIn Learning account is active. The personal data will be deleted from the UCD LinkedIn Learning account by LinkedIn within 3 months of your cessation of employment with UCD.

b) UCD HR Retention Period

A record of each UCD employee's training and development is kept for and accessible to each individual, this is located on their 'My Development' record which they can access indefinitely through Infohub. UCD LinkedIn Learning is not integrated with this internal system however, learners can update their 'My Development' record with details of LinkedIn Learning courses completed if they wish to have a comprehensive record in one place. Any such manual updates will be retained in line with the associated retention period.

9. YOUR RIGHTS IN RESPECT OF YOUR UCD LINKEDIN LEARNING ACCOUNT

a) Right to access:

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

b) Right to rectification:

If you ever identify any inaccurate data which is recorded on your UCD LinkedIn Learning account, you have a right to request that that your record is updated for accuracy. If the inaccurate data relates to any of your UCD data identifiers which are shared with UCD LinkedIn Learning, please contact UCD People Development to amend the data record at peopledevelopment@ucd.ie. If in the unlikely event there is any error in your course completion record, please contact LinkedIn Learning directly through your UCD LinkedIn Learning account.

c) Right to close UCD LinkedIn Learning account:



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If you decide that you no longer wish to access UCD LinkedIn Learning as a UCD employee, you have the right to close and terminate your account.

10. RIGHT TO LODGE A COMPLAINT

a) UCD People Development

If you have any concerns in relation to how your personal data is being processed as part of your UCD LinkedIn Learning account, UCD HR would appreciate if you could contact UCD People Development (peopledevelopment@ucd.ie) as a first port of call to discuss any concerns to see if it is possible for us to help and reassure you about the protection of your privacy rights.

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 UCD LinkedIn Learning 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 DPC if you have serious concerns that your rights as a data subject under the GDPR have been breached through UCD LinkedIn Learning. However, we really wish to help, and would encourage you to contact UCD People Development with any initial concerns. Details of how to lodge a complaint can be found on the Data Protection Commission's website.

UCD LinkedIn Learning, Privacy Notice Version History

Version 1 of this Privacy Notice was approved by UCD HR on 28/9/2020