

UCD Workvivo privacy statement

Introduction

UCD fully respects your right to privacy and actively seeks to preserve the privacy rights of those who share information with the University. Any personal information processed by the University will be treated in accordance with the relevant data protection legislation.

This statement relates to the University College Dublin (UCD) Employee Engagement & Internal Communications Service - UCD Workvivo (the service) which is developed, hosted and supported by Workvivo. This service forms part of how UCD supports employee engagement, awareness and collaboration across the University. The relationship between UCD and Workvivo is a contractual one, which includes special considerations in terms of data protection.

What is the Service?

UCD Workvivo, powered by Workvivo is an employee engagement platform that connects the employees in University College Dublin to the organisation, its goals and each other. It is a single, branded gateway that connects users to 'all things UCD' and is available on computer and mobile devices. The platform is designed for internal communications between UCD employees and for the University to communicate directly to employees.

Why and how do we collect and process the information and for how long we keep it?

All relevant employees **will be provisioned from the HR management system** using the following data: *name, email address, school/unit, role, UCD phone number, reports-to (manager), known-as (if relevant)*. This provisioning into the service will happen automatically when an employee joins. The employee will be deprovisioned from the service when they leave the University. The data is kept for the duration of employment at UCD.

Legal Basis

Below is a list of the space types in UCD Workvivo and the basis on which personal information is processed to automatically set you up on the platform. This processing is necessary in order to ensure all qualifying employees have single sign-on and secure access to the service and are correctly assigned to the correct community spaces in UCD Workvivo.

Some spaces provide UCD employees with work and role relevant business information from e.g. UCD UMT members, or Head of School or Head of unit, while other spaces cater

for joint interests, or community building and social activities. Data subject rights available to you depend on the basis for processing linked to individual space types.

Space type	Basis for using personal information for access and allocation to correct space
University Spaces (all employees)	Legitimate interest - Essential information for operation of University and undertaking role
Community Spaces (your unit)	Legitimate interest - Essential information for operation of University and undertaking role
Project Spaces (project you are a member of)	Legitimate interest - Essential information for operation of University and undertaking role
Community of Practice Spaces	Consent (i.e. you choose to join)
Interest Spaces	Consent (i.e. you choose to join)
Social Spaces	Consent (i.e. you choose to join)

Who has access to the information and with whom do we share it?

UCD will share your data with third parties, where necessary, for purposes of the processing and where there is a legal basis to do so. Contracts are in place with the third party data processor that protect your rights under data protection law.

The University will share the data (as listed above) with Workvivo, for purposes of the processing to provide the service to University employees. The processing of this data will take place within the EEA.

In exceptional cases permitted by data protection laws, UCD may disclose data without user consent or notice, for example, if it is required to investigate offences, or to comply with a legal obligation.

Collection and use of personal information

Some data, including personal data, is processed for operational purposes and to manage the service. Information on Workvivo activity is collected routinely by UCD and by its service provider, Workvivo, in order to provide the employee engagement and collaboration service. Workvivo does not collect, use or disclose personal information except to carry out its obligations to UCD.

As a service, the Workvivo platform allows employees to post information to specific groups called *Spaces*. Most of the posts will be within School and Unit spaces. In specific cases and for specified units, information can be posted more generally. There are procedures around this and this element of the service is strictly limited.

When a person posts, likes or comments, their name is posted beside the item. The only element where an employee interacts anonymously with the service is through the participation in pools/surveys.

At any stage an employee may return to a post they made and delete it if they wish, including prior to leaving the University.

When an employee leaves the University, their access to their UCD Workvivo account will be removed. Any prior posts, content published and/or uploaded to the UCD Workvivo platform which an employee has made during their employment with UCD will be retained on the UCD Workvivo service platform but under the name 'previous colleague'.

Should a person leaving UCD not want to have one of their posts retained long term as 'previous colleague', they can either delete the post prior to leaving UCD, or if their personal data is contained in the post and they have left already, they need to contact the Workvivo administrator at workvivo@ucd.ie to do so on their behalf.

Posting on UCD Workvivo

Upon signing in to the service for the first time, employees will be asked to agree to use Workvivo and associated services in accordance with the [UCD Acceptable Use Policy](#) and follow the UCD [code of practice](#) at all times when interacting with the service.

Employees should not post personal or sensitive information to any part of UCD Workvivo or add links to inappropriate or unsuitable content. In particular sensitive documents should not be shared via the service as downloadable documents. Secure documents should be stored and shared using Google Drive.

UCD reserves the right to monitor user activity in Workvivo, and where necessary to take appropriate action. UCD is not responsible for the content of any websites linked from Workvivo, or for personal information disclosed by individuals themselves. UCD may also collect anonymised data on Workvivo usage for statistical purposes, planning for service improvements or administrative functions.

When uploading photographs or videos featuring other identifiable people, the employee should ensure that those featured in the imagery were aware that it could be published to UCD internal platforms (and external if appropriate) and were given with details of how to opt out of inclusion, through the provision of contact details etc.

All employees have access to a 'Report a Post' function - at the top right-hand corner of each post (shown as '...'). The moderator for that area of content will be alerted and will make a judgement call, based on UCD policies or the purpose of the platform, on whether or not the post needs to be removed. The Moderator's decision is final.

UCD has put in place reasonable appropriate administrative, technical, personnel, procedural and physical measures to protect your personal data against loss, theft, unauthorised access, use or modifications.

Where your personal information is shared, UCD requires all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. UCD only allows third parties to process your personal information for specified purposes and in accordance with UCD's legal obligations and UCD contractual agreements. UCD will manage a data breach in accordance with University's personal data incident & breach management procedures and Data Protection Law. For further information on identifying and reporting a data breach please refer to the University's GDPR page.

Data Retention

The University will retain your personal data in UCD Workvivo for as long as you are a member of the eligible employee cohort.

Your Rights, Queries or Complaints

Your Rights Pursuant to the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) you have the following rights:

- Right to access
- Right to object
- Right to rectification
- Right to erasure if data is incorrect or no longer needed
- Right to restriction
- Right to data portability

Some of these rights are not absolute rights and do not apply in all situations. If you want to make use of your rights, please contact the Workvivo administrator at [**workvivo@ucd.ie**](mailto:workvivo@ucd.ie).

If you have concerns about your rights as a UCD Workvivo user, you can contact the UCD DPO by email [**gdpr@ucd.ie**](mailto:gdpr@ucd.ie).

If you are not satisfied with UCD's response or believe we are not processing your personal data in accordance with the law, you have the right to complain to the Irish Data Protection Commission. For more detail see <https://www.dataprotection.ie> This statement should not be construed as a contractual undertaking.

[Workvivo Privacy policy.](#)