All processing of personal information must be ‘fair’ and ‘lawful’. Fairness means that we must tell people how their information will be used. Lawful means that we must be able to explain why it is lawful for us to have or use personal information according to the requirements of applicable data protection law.

This template should be used to provide fair processing information in when personal data is collected or used or used by the University, either directly or where information is received from third parties. For support in the use of this template, please contact dataprotection@dundee.ac.uk.

FOR UNIVERSITY USE ONLY – Notes on use of this template

- A draft completed fair processing statement should be completed for all intended uses of personal data.
- The draft should provide the detail on how information is used, data types and any partners or systems used in the processing of information.
- The draft should be forwarded to dataprotection@dundee.ac.uk for comment before use. Information Governance will assist with why processing may be ‘lawful’.
- The completion of a Data Protection Impact Assessment will assist in the completion of the fair processing statement. This is mandatory for all high-volume or high-sensitivity (special categories) use of personal data or where new systems or technology are introduced. Please see dundee.ac.uk/information-governance/dataprotection.
- The template should not be varied with approval from Information Governance.
- Any variations should be recorded along with the rationale/authority for the variation.
- Once completed the privacy notice should be published on a relevant part of the University’s website and/or provided to individuals at the point their data is collected.

TEMPLATE

How we use your information

To [PURPOSE] we require some of your personal data.

The personal data [YOU PROVIDE/PROVIDED BY NAMED THIRD PARTY] will be used to [USES].
The University will keep your personal data for [RETENTION PERIOD]. It will then be [DESTROYED or ANONYMISED AND RETAINED FOR AUDIT/SERVICE MANAGEMENT/PLANNING/RESEARCH PURPOSES etc].

[IF REQUIRED We will respect your preferences concerning the ways in which we may contact you. If you wish to update these at any time, please let us know by [HOW].]

**Personal data**

The personal data required for [PURPOSE] is [CATEGORIES OF DATA].

**Sensitive (special categories) of personal data**

The sensitive personal data required for [PURPOSE] is [CATEGORIES OF DATA].

[OR]

No sensitive personal data is required for [PURPOSE].

**Data controller**

The data controller for your personal information is the University of Dundee. Your data may be processed by the University’s nominated agents such as software or service providers.

Providers used for the purpose are: [PROVIDERS].

[WHERE APPLICABLE]

Of those the following providers are based outwith the European Economic Area (EEA): [PROVIDERS].

The University has the following safeguards in place in respect of data processed outwith the EEA: [SAFEGUARDS].

**Lawful processing**

The University asserts that it is lawful for it to process your personal data for the purposes detailed above [REASON(S) FOR LAWFUL PROCESSING].

The University asserts that it is lawful for it to process your sensitive personal data for the purposes detailed above [REASON(S) FOR LAWFUL PROCESSING].

**Your rights**

The University respects your rights and preferences in relation to your data. If you wish to update, access, erase, or limit the use of your information, please let us know by emailing [LOCAL CONTACT]. If you wish to
complain about the use of your information please email dataprotection@dundee.ac.uk. You may also wish to contact the Information Commissioner’s Office.